SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF SANTA BARBARA
SANTA MARIA BRANCH; COOK STREET DIVISION
DEPARTMENT SM-2 HON. RODNEY S. MELVILLE, JUDGE

THE PEOPLE OF THE STATE OF)
CALIFORNIA,)
Plaintiff,)
-vs-) No. 1133603
MICHAEL JOE JACKSON,)
Defendant.)

REPORTER'S TRANSCRIPT OF PROCEEDINGS

FRIDAY, MAY 6, 2005

8:30 A.M.

(PAGES 9207 THROUGH 9271)

REPORTED MICHELE MATTSON McNEIL, RPR, CRR, CSR #3304
BY: Official Court Reporter 9207

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I N D E X

Note: Mr. Sneddon is listed as “SN” on index.
Mr. Zonen is listed as “Z” on index. Mr. Auchincloss is listed as “A” on index.
Mr. Mesereau is listed as “M” on index. Ms. Yu is listed as “Y” on index.
Mr. Sanger is listed as “SA” on index.

DEFENDANT’S WITNESSES	DIRECT	CROSS	REDIRECT	RECROSS
ROBSON, Joy	9210-M	9218-SN	9262-M	

Santa Maria, California
Friday, May 6, 2005
8:30 a.m.

THE COURT: (To the bailiff) Gosh, you don't have to shout.
(Laughter.)
THE COURT: Good morning.
Call your next witness.
MR. MESEREAU: Yes, Your Honor. The next defense witness is Joy Robson.
THE COURT: Please raise your right hand, face the clerk right here.

JOY ROBSON
Having been sworn, testified as follows:

THE WITNESS: I do.
THE CLERK: Please be seated. State and spell your name for the record.
THE WITNESS: I'm Joy Robson. It's J-o-y; R-o-b-s-o-n.
THE CLERK: Thank you.

DIRECT EXAMINATION
BY MR. MESEREAU:
Q. Good morning, Miss Robson.
A. Good morning. 9210

1 Q. Miss Robson, where is your home?
2 A. In Sherman Oaks, California.
3 Q. And do you know the fellow seated at counsel
4 table to my right?
5 A. Yes, I do.
6 Q. Who is he?
7 A. That's Michael Jackson.
8 Q. How long have you known him?
9 A. 18 years.
10 Q. And how did you meet Mr. Jackson?
11 A. Originally, in Australia in --
12 Q. I think you need to speak up a little bit.
13 A. Sorry. In Australia. He was touring on the
14 "Bad" tour, and my son Wade was five years old and
15 won a Michael Jackson look-alike/dance-alike
16 competition.
17 Q. Did you develop a friendship with Michael
18 Jackson?
19 A. Not immediately. Two years later, we
20 returned to the United States for -- Wade was
21 dancing here, and we reassociated with him at that
22 point, and became friends from there, from 1989.
23 Q. Are you still Michael Jackson's friend?
24 A. Absolutely.
25 Q. Have you been to Neverland?
26 A. Many times.
27 Q. How many times do you think you visited
28 Neverland? 9211

A. I have no idea. We average about four times a year since we've lived in the United States, which is 14 years now, and quite a few times before that.
Q. Do you remember the first time you visited Neverland?
A. Yes. It was in January of 1990.
Q. And how did you end up visiting Neverland?
A. When we were here, we called around, trying to find Michael again. He had told us if we returned to the United States to contact him. So we called around, and we eventually were put onto his personal assistant, which at that time was Norma Stakos, and they called Michael.
He remembered us, and said he would like to see us again. So we met him at a recording studio where he was working at the time.
Q. And did you stay at Neverland on that first visit?
A. Yes, he invited us to stay that weekend, so we did. We went -- we were touring the United States, we were here on vacation as well. We went away for the week, and came back for the second weekend.
Q. Have you seen Michael Jackson's bedroom at Neverland?
A. Yes.
Q. When did you first see Michael Jackson's bedroom at Neverland? 9212

A. That first weekend when we stayed with him.
Q. Ever stayed in that room yourself?
A. No.
Q. Do you recall your son staying in Michael Jackson's room at Neverland?
A. Yes.
Q. And explain that, if you would.
A. Well, the first -- the first night they had been out doing the usual thing at Neverland, playing. And later that night, they all came back to the suite where my husband and I were staying, and my parents were with us, as well. We were all talking in the suite.
And Wade had been impersonating Michael for some time and had lots of costumes of Michael's that we had made. And Michael was looking at them, and we were just all discussing those.
And then it was getting late, and my children said to me, both Chantel and Wade, my daughter, said, "Can we stay with Michael."
And my husband and I sort of looked at Michael, and said, "Well, if that's okay with you."
And he said, "Oh, absolutely. If they'd like to stay, that's fine."
Q. And did you allow your son and daughter to stay in his room?
A. Yes.
Q. How many times do you think your son and 9213

daughter stayed in his room?
A. Many times. I have no idea.
Q. Did you ever have a problem with them doing that?
A. Not at all.
Q. Have you ever traveled with Mr. Jackson?
A. Only once. We went to Las Vegas with him.
Q. What was the purpose of that trip?
A. We went to see Siegfried & Roy.
Q. How did you get to Las Vegas for that trip?
A. We went on a private jet. I think it belonged to Steve Wynn. We were staying at The Mirage.
Q. And did you stay at The Mirage Hotel?
A. Yes.
Q. And where did you stay?
A. We had a penthouse suite. There were two bedrooms, and I stayed in one of them.
Q. And who stayed in the other room?
A. Michael and Wade sort of went between both rooms. He did stay in Michael's room most of the time.
Q. And were you ever in Michael's room on that trip?
A. Yes. As a matter of fact, we spent a whole day sitting in bed, the three of us, eating popcorn, watching cartoons.
Q. Ever see anything inappropriate happen on 9214

that trip?
A. Never.
Q. Ever see anything inappropriate happen at Neverland?
A. Never.
Q. Okay. When's the last time you spoke to Michael Jackson?
A. Two weeks ago. We visited his children at Neverland.
Q. Okay. And do you consider yourselves friends of the family of Mr. Jackson?
A. We consider us very good friends, if not family.
Q. Okay. Did Mr. Jackson ever use the word "family" to describe you and your children?
A. Yes.
Q. Okay. Did you ever have any problem with that?
A. Never.
Q. Ever seen Mr. Jackson hug your children?
A. Mr. Jackson hugs everyone.
Q. Ever seen Mr. Jackson kiss your children on the cheek?
A. Yes.
Q. Did you ever have a problem with that?
A. No.
Q. Ever see Mr. Jackson hold any of your children by the hand? 9215

A. I think so, yes.
Q. Did you ever have a problem with that?
A. No.
Q. Ever seen Mr. Jackson playing with your children?
A. Yes.
Q. And what did you see him do?
A. He'd play -- I've seen him play games, hide-and-seek. I've seen them climb trees. I've seen them play in the water fort at the ranch. They play constantly.
Q. Did you ever have any problem with any of that?
A. No. We all did it together often. We were -- all played together.
Q. How would you describe Neverland?
A. I would have once said the happiest place on earth. I -- I always felt that when we arrived at Neverland, you forgot all your problems, you forgot everything. It seemed like a world on its own. You would drive in there, and it was very serene, very peaceful, very beautiful. Inspirational. And everything was perfect when you drive out and reality would hit again.
Q. What did you like to do there?
MR. SNEDDON: Object as immaterial, Your Honor.
THE COURT: Sustained. 9216

Q. BY MR. MESEREAU: What did you do at Neverland?
MR. SNEDDON: Object as immaterial.
MR. MESEREAU: They put an issue what Neverland's all about, Your Honor.
THE COURT: The objection is overruled.
Q. BY MR. MESEREAU: What did you do at Neverland?
A. We watched movies. I particularly liked the chimpanzees. I spent a lot of time playing with the chimps. All the animals, I enjoyed. We would play on the water fort. We'd drive the quads around the hills. Just a fun time always.
Q. And did you ever meet someone named Blanca Francia?
A. When you say "meet" her, I mean, I knew she was working there, and I basically would say "Good morning" to her if I saw her, but that would be the extent of it.
Q. Ever see your son in a shower with Michael Jackson?
A. No. Never.
Q. Ever seen the Jacuzzi at Neverland?
A. Yes.
Q. Ever been in it yourself?
A. Yes.
Q. How many times, do you think?
A. Oh. Maybe six or eight times. 9217

Q. Now, to your knowledge, has your daughter
ever been in Michael Jackson's room at Neverland?
A. Yes.
Q. And did she ever stay over there, to your
knowledge?
A. Yes.
Q. Did you have any problem with that?
A. Not at all.
MR. MESEREAU: No further questions.
THE COURT: Cross-examine?

CROSS-EXAMINATION
BY MR. SNEDDON:
Q. Good morning.
A. Good morning.
Q. Before you testified here today, did you
review any documents?
A. I did review my testimony from the grand
jury last time, and the civil suit.
Q. Mr. Feldman's grand jury --
A. Yes.
Q. -- deposition?
A. Yes.
Q. Okay. Good. I just want to go back and see
if we can discuss some of the things you testified
about this morning.
As I recall, you first met the defendant at
a dance contest in Australia, correct? 9218

A. Correct.
Q. And that was in what year?
A. That was in 1987.
Q. And then your first trip to America was --
or maybe not the first trip, but in 1990, in
January, you came here with the dance troupe,
correct?
A. Yes.
Q. And the time that you met Mr. Jackson in
Australia was in connection with your son winning a
dance contest?
A. Yes.
Q. And the occasion of you meeting Mr. Jackson
was you were brought behind the stage with a lot of
other people who were back there; is that right?
A. It was a meet-and-greet situation, yes.
Q. There wasn't a lot of substance to it?
A. No, it was just, "How are you? It's a
pleasure to meet you," type of thing.
Q. Okay. And then the next time that you meet
Mr. Jackson is when you come to the United States in
January of 1990, correct?
A. Yes.
Q. And when you came here, there were no
arrangements when you first came here to meet with
Mr. Jackson?
A. No.
Q. And it was as a result of you making contact 9219

with Norma Stakos that you were able to make contact
with Mr. Jackson, correct?
A. Yes.
Q. And then you were invited up to the ranch,
as I understand it, for a weekend?
A. Correct.
Q. So you weren't there for an entire week?
A. No.
Q. Just for the weekend?
A. Yes.
Q. And when you went there for the weekend, the
first night, your son and daughter spent the night
in Mr. Jackson's bedroom, correct?
A. Yes.
Q. Now, as I understand it, then, this was only
the second time that you had met Mr. Jackson; is
that correct?
A. Yes.
Q. And the first time you'd really met him on a
one-on-one personal basis, correct?
A. Yes.
Q. And how old was your son at this time?
A. When we were at Neverland?
Q. Yes, ma'am.
A. He was seven.
Q. Seven. How old was your daughter?
A. Ten.
Q. So your son and your daughter spent the 9220

first night with Mr. Jackson, and this was really
the first night you'd ever met Mr. Jackson, that's
correct, on a substantive level?
A. Well, basically we'd spent the day with him,
yes.
Q. That was the first time?
A. Yes.
Q. Now, did you know that your son and daughter
spent the night with Mr. Jackson in his bed?
A. They did not.
Q. They did not.
A. They slept on the mezzanine level.
Q. That's your belief?
A. That's what they had told me.
Q. So that -- if your son testified here in
trial yesterday that he slept in the same bed with
Michael Jackson with his sister, that would be
inconsistent with what he told you before?
A. That was the second night.
Q. I'm asking you the first night.
A. Well, that's -- what I've been told by my
daughter and my son was the first night they slept
on the mezzanine level.
Q. So it would be correct that if your son
testified to that yesterday, that on the first night
he and his sister slept with Mr. Jackson in Mr.
Jackson's bed, that statement would be inconsistent
with what they had told you before? 9221

MR. MESEREAU: Objection. Improper question, referring to the testimony.
THE COURT: I'll sustain the objection.
Q. BY MR. SNEDDON: The second night your daughter did not stay with Mr. Jackson?
A. She did.
Q. The second night also?
A. Yes.
Q. Both nights?
A. Yes.
Q. Do you recall telling Mr. Feldman during the deposition that on the second night your daughter did not stay with the defendant?
A. Yes, as a matter of fact, when I read that testimony, and my daughter has told me since that my memory was incorrect, that she did stay.
Q. So you're basing your testimony here today on something your daughter told you as opposed to what you recall when you were under oath in a deposition?
A. Yes.
Q. Now, is it your testimony that your husband was present during the first visit?
A. Yes.
Q. Did you go back for a second weekend?
A. Yes.
Q. And was there a weekend between, or more than one week in between? 9222

A. There was a week in between.
Q. So it was the following weekend you went back?
A. Yes.
Q. And when you went back on that occasion, who was present from your family?
A. My husband, my daughter, my son, and my parents.
Q. Now, on the occasion of the first visit, were your husband and your parents with you?
A. Yes.
Q. Do you recall testifying at a deposition that your parents and your husband were in San Francisco on a trip the first time you visited the ranch?
A. No, they went -- we were all there for the weekend. They left -- we all left and went to San -- no, they went to San Francisco the second week. We went back to Los Angeles with Michael.
Q. The question was, do you recall testifying to that?
A. I wouldn't have testified to that.
Q. Okay. Now, during that first visit, the first weekend that you were at the ranch, did the subject of your son going on a trip to Japan come up?
A. Yes.
Q. So this would have been on the first day or 9223

1 the second day?
2 A. I don't recall, I'm sorry.
3 Q. One of those two days, in any case?
4 A. Possibly.
5 Q. And the subject of the conversation was that
6 you had agreed to allow your son to accompany Mr.
7 Jackson on a trip to Japan if they wanted to go,
8 correct?
9 A. I think we talked about it.
10 Q. Well, did you agree to allow him to go with
11 Mr. Jackson on a trip to Japan?
12 A. I can't remember really. I think I may
13 have, but we decided not to.
14 Q. Mr. Jackson decided he would rather spend
15 time with your son than go to Japan?
16 A. I think the decision was Wade preferred to
17 stay here. Stay at Neverland.
18 Q. So it wasn't Mr. Jackson's decision. It was
19 Wade's decision?
20 A. It was Wade's decision.
21 Q. Do you recall testifying in the deposition
22 with Mr. Feldman that that was Mr. Jackson's
23 decision to decide not to go to Japan, because he
24 wanted to stay and have the time with your son?
25 A. I think what happened was that Wade was
26 given the choice.
27 MR. SNEDDON: Move to strike, Your Honor.
28 THE COURT: Stricken. 9224

THE WITNESS: I don't remember testifying to that.
Q. BY MR. SNEDDON: During the first weekend trip to Neverland, did you go to Toys-R-Us?
A. No.
Q. Was that the second weekend?
A. I never went to Toys-R-Us.
Q. Did your children go to Toys-R-Us?
A. Yes.
Q. Which one of those weekends did they go?
A. I don't recall.
Q. But you do recall a trip?
A. Yes.
Q. And they went with Mr. Jackson?
A. Yes.
Q. And it was after hours, the store was closed?
A. I don't remember.
Q. And they were allowed to buy anything -- or allowed to get anything they wanted and Mr. Jackson paid for it, correct?
A. I think so.
Q. So as I understand it, then, it's your testimony that if Mr. Jackson had wanted to go to Japan with your son, on this first time that you'd met him, that you would have allowed that?
A. I doubt that --
Q. You had agreed to that? 9225

A. I don’t think so. I don’t think I would have agreed to that.
Q. Do you recall testifying in your deposition that you had agreed to allow him to go to Japan?
A. No.
Q. You had decided early on in your son’s career, or life, actually, that you wanted to get him into the entertainment business, correct?
A. He decided. Not me.
Q. Well, he was five years old.
A. Yes. He made that decision at five.
Q. At five. It was all his decision?
A. Yes.
Q. Okay. And you were going to do everything you could as a good mother to try to support that decision, correct?
A. Yes.
Q. And you felt that your having a good relationship or connection with the defendant in this case could promote that career; isn’t that correct?
A. That’s -- you’re putting words in my mouth. I’ve never said that.
Q. I didn’t ask you whether you said it or not. I asked you if that’s what you were thinking.
A. No.
Q. You weren’t thinking that at all?
A. Not at all. 9226

Q. You weren't thinking that Mr. Jackson could help propel your son in an entertainment career?
A. That was not my motive.
Q. I -- I'm not trying to --
A. Yes, you are.
Q. -- demean your motives.
No, I'm not, ma'am. I'm asking a simple question. Did you, in your mind, think that by having a friendship and a connection with Mr. Jackson that could help promote your son's career?
A. I can't answer that, because I don't think that that -- you're make -- you're trying to make me say that that was my basis for our friendship, and that's not true.
MR. SNEDDON: Move to strike as nonresponsive.
THE COURT: Stricken.
Q. BY MR. SNEDDON: I asked you a question about whose decision it was to cancel the trip to Japan. And I asked you if it was, in fact, Mr. Jackson -- that you had stated previously in your testimony it was Mr. Jackson, and you said you had no recollection of that, correct?
A. Yes.
Q. And did you have a chance to review your deposition for Mr. Feldman prior to coming to court here today?
A. I don't remember reading that. 9227

Q. Would it help you to refresh your recollection if I showed you the deposition?
A. Yes.
MR. SNEDDON: With the Court's permission, Your Honor.
THE COURT: You may.
MR. SNEDDON: Or Mr. Mesereau? Bob?
MR. MESEREAU: That's okay.
Q. BY MR. SNEDDON: The procedure is you just read that to yourself quietly, and then I'll ask you a question, okay? And I want to direct your attention to page 181, and from lines 4 to line 9. And you can read anything else you want.
A. Okay.
Q. Having read that, does that refresh your recollection as to whose idea it was to cancel the trip to Japan?
A. Well, it says that Wade was given the choice, and Wade preferred to stay at Neverland.
Q. It says, "After the first weekend that we were there, he cancelled the trip because he wanted to stay and spend some time with us," does it not?
A. If you read further down.
Q. Yeah, it says, "But he asked to go on this trip with your son," and "I offered to let Wade go with him"?
A. Further.
Q. Do you want me to read the whole thing? 9228

A. No, just a couple, few more lines.
Q. It doesn't get any better.
A. Just a few more lines. It will say exactly what I said.
Q. And then Wade had a choice of going to Japan or staying at Neverland, and he chose to stay?
A. Yeah. That's what I said, Wade was given the choice. And he decided to stay at Neverland.
Q. But it was the defendant's choice not to go to Japan, as you testified.
A. He had a business trip and he cancelled it, and because Wade decided to stay at Neverland, but it was Wade's choice.
Q. Thank you.
After this trip, you went back to Australia, correct?
A. Yes.
Q. And before we get to when you come back, which I think is in May of 1990, correct?
A. Yes.
Q. Okay. I want to ask you a few things about the tour of the house. And when you went to the house at Neverland Ranch, did you go throughout the entire house?
A. The first trip?
Q. Yes, ma'am.
A. Actually, yes.
Q. So you were shown the entire house? 9229

A. Yes.
Q. Including Mr. Jackson's bedroom?
A. Well, actually, we arrived before Mr. Jackson, my parents and I. And Mark Quindoy showed us through the house.
Q. Okay.
A. I don't think we went into Michael's bedroom initially.
Q. At some point during that tour or during that weekend, did you go into Mr. Jackson's bedroom?
A. Yes.
Q. When you go into Mr. Jackson's bedroom, you walk down a hallway before you get to the entrance to the door to his bedroom, correct?
A. Yes.
Q. And as you go down that hallway and you approach the door, a little chime goes off, correct?
A. Yes.
Q. And the door cannot be opened from the outside, correct, it's locked?
A. I think so, yes. From memory.
Q. Now, when you went through the rest of the house, did you find any chimes that went off in any of the other rooms in the house?
A. No.
Q. And it's true, is it not, that none of the other doors in the house had locks on them?
A. There was no one else staying in any of the 9230

other rooms.
Q. No, I asked you whether there were any other rooms in the house where you had to have somebody from inside open the door in order to get into the room?
A. No.
Q. So you were aware of the fact that at the time that you allowed your children to sleep with Mr. Jackson on the first day or night that you met him, that those children were going to be in a location which you could not get to without somebody from the inside opening the door, correct?
A. Yes.
Q. Is there something funny about that?
A. I just -- it's not a problem.
Q. I can understand. You weren't concerned about it at all?
A. Not at all.
Q. Somebody you just met?
A. I -- I think there's a certain trust that we developed immediately. Nothing ever crossed my mind that there would be a problem there.
Q. In May, when you came back, it was for the purpose of your son participating in an L.A. Gear commercial?
A. Yes.
Q. And who arranged for him to be in that commercial? 9231

A. Michael.
Q. And Mr. Jackson paid his way over here, correct?
A. L.A. Gear paid.
Q. And how did you -- how was yours paid?
A. L.A. Gear. He was a minor.
Q. L.A. Gear paid for that?
A. Yes, they have to if a minor's working.
Q. Do you recall testifying at your deposition that that was paid for by Mr. Jackson?
A. I testified that L.A. Gear paid for it. I read that when I reviewed it.
Q. Now, at the time that you came over here for the L.A. Gear commercial, you were staying in The Holiday Inn?
A. Yes. In Westwood.
Q. And you were here for approximately six weeks?
A. Yes.
Q. And Mr. Jackson had a condo right across the street?
A. Yes.
Q. And you testified before, I believe, that during that six-week period on at least half of the occasions that your son was with Mr. Jackson in Mr. Jackson's bedroom in that condo, correct?
A. I think so.
Q. And on a couple of those occasions, you 9232

actually were in the condo with them and you and your daughter, or you, slept on the floor; do you recall that?
A. I think that was the first trip that my daughter and I slept on the floor. It wasn't during that time.
Q. The first trip back in January?
A. Yes.
Q. Was there a time that you visited Mr. Jackson in his condo in January?
A. Yes.
Q. Now, these visits to The Holiday -- these visits to Mr. Jackson when you were staying at The Holiday Inn, many of those calls from Mr. Jackson were very late at night; isn't that correct?
A. Yes, he was working.
MR. SNEDDON: Move to strike as nonresponsive, Your Honor.
THE COURT: I'll strike the last -- after "Yes."
Q. BY MR. SNEDDON: And he would call, and on some occasions you would walk your son across the street, correct?
A. Yes.
Q. And you'd leave him there and go back to the hotel?
A. Yes.
Q. And there was just he and Mr. Jackson 9233

1 together?
2 A. Yes.
3 Q. And you knew that at that particular point
4 in time, that he was sleeping with Mr. Jackson in
5 Mr. Jackson's bed, correct?
6 A. Yes.
7 Q. When you came over to make the L.A. Gear
8 commercial, did your husband come with you?
9 A. No.
10 Q. At this point in time, were you and your
11 husband separated?
12 A. No.
13 Q. And your daughter didn't come with you?
14 A. No. She was in school.
15 Q. Okay. Now, during the six-month period, I
16 want to just concentrate on the period that we're
17 talking about, the May visit, you also visited the
18 ranch on occasion, did you not?
19 A. Yes.
20 Q. And when you visited the ranch on those
21 occasions, you slept in the guest cottage, correct?
22 A. No, I slept in the house.
23 Q. And where in the house?
24 A. In the rose bedroom. In the rose bedroom.
25 Q. Okay. And your son slept with Mr. Jackson?
26 A. Yes.
27 Q. Now, do you recall an incident that occurred
28 on Mother's Day during 1990 on a trip to the ranch? 9234

A. Yes.
Q. And you were upset, correct?
A. Yes.
Q. And you were crying at one point?
A. Yes.
Q. And the reason for that was that you had not seen your son all day, correct?
A. Yes.
Q. And it was Mother's Day?
A. That's right.
Q. And you found out that the reason that you hadn't seen your son that day was because he had been sleeping all day, correct?
A. I think so. Yeah.
Q. And you spoke to some people at the ranch about your feelings, did you not, one of the employees?
A. I think someone asked me if I was okay.
Q. And you told them that you felt that your son would rather be with Michael Jackson than with you, correct?
A. I don't remember saying that.
Q. Do you know somebody by the name of Charli Michaels?
A. Yes.
Q. And who is Charli Michaels?
A. I think she worked security at the ranch.
Q. And did you tell Charli Michaels that you 9235

felt that the defendant, Michael Jackson, was
separating you from your son?
A. I don't recall saying it.
Q. Do you recall testifying to that in your
deposition with Mr. Feldman?
A. No.
Q. Would it refresh your recollection if I
showed you a copy of the deposition?
A. Yes.
MR. SNEDDON: May I approach, Your Honor?
THE COURT: Yes.
THE WITNESS: Okay.
Q. BY MR. SNEDDON: Does that refresh your
recollection?
A. I don't remember saying it, but I testified
to it.
Q. I'm sorry?
A. I said I don't remember saying it, but
obviously I testified back then about it. I don't
remember saying it.
Q. You said that Wade would rather be with
Michael than with yourself and you were upset about
it?
A. Well, I read it, but I honestly don't
remember saying it.
Q. At the time that you were at the ranch on
the first occasions that you were there, to your
knowledge, did Michael Jackson have a personal maid? 9236

A. Yes.
Q. And who was that?
A. I don't remember.
Q. Do you remember meeting anybody by the name of Blanca Francia?
A. I remember her being there. I think she did clean Michael's room, I think.
Q. Now, during the time that you -- let me just go through this real quickly so we can get up to the time frame involved here.
You came back in May of 1990, correct?
A. Yes.
Q. And you were here for six weeks, correct?
A. Yes.
Q. And then you came back again in February of 1991, correct?
A. Yes.
Q. For about seven days?
A. Yes.
Q. And during the time that you were here in 1991, you spent time on the ranch, correct?
A. Yes.
Q. You and your son?
A. Yes.
Q. And then in September 1991 -- well, let me go back. When you came here in February of 1991 for seven days, did your husband come with you?
A. No.

Q. When you visited in September of 1991, you came permanently, correct?
A. Yes.
Q. You had no intention of going back to Australia?
A. No.
Q. And you had your son and your daughter with you?
A. Yes.
Q. And your husband did not come?
A. No.
Q. And at that point you had been separated from your husband?
A. Yes.
Q. And then from that point, from September of 1991 up till, let's just say, September 1993 - okay? - the time frame involved, you and your son spent a great deal of time with Michael Jackson, you were around him a lot, correct?
A. I don't think so.
Q. You were not at the ranch on a number of occasions during 1991?
A. My memory is in the entire time we've lived here since 1991, we've only been at the ranch with Michael on four occasions in 14 years.
Q. Four occasions?
A. Every other time we've been here without him. 9238

Q. Would that be the same for your son?
A. Yes.
Q. So --
A. He came one -- all the time by himself.
Q. You testified that you've been out at the ranch on an average of about four times?
A. Four times a year, but Michael was never there.
Q. Was that all the way through today?
A. Yes.
Q. He's never there when you go there?
A. Very rarely. I can only remember four times in 14 years that we've been there with him since we have lived here.
Q. So when you were testifying for Mr. Mesereau and you were talking about ever seeing any inappropriate touching, there were only on four occasions that you were even at the ranch to see anything, correct?
A. Since we've lived here, 1991.
Q. You didn't see anything before that, did you?
A. No.
Q. Do you recall having a conversation in which you -- with June Chandler? Do you know who June Chandler is?
A. Yes.
Q. June Chandler is whom? 9239

A. Jordie Chandler's mother.
Q. You've met June Chandler?
A. Yes.
Q. You've met Jordan Chandler?
A. Yes.
Q. Jordan Chandler was at Neverland Valley Ranch at the same time as your son, correct?
A. We were all there together on one weekend.
Q. Okay. And do you recall testifying to a situation in which your son, Wade, was upset because Jordan Chandler was going to spend the night in Michael Jackson's room and Wade had to stay with you in the guest cottage?
A. I don't remember that. I remember reading it in my testimony, but I don't remember him being upset.
Q. Maybe I'll use a different word. Disappointed?
A. Possibly.
Q. But you do remember the incident?
A. No.
Q. You don't?
A. No.
Q. So when you said you read your transcript, it's in your transcript, right?
A. I read it in the transcript, but it's 12 years ago. I don't remember it.
Q. I understand. Do you have any reason to 9240

1 believe that you would testify to something under
2 oath in a deposition that wasn't true at the time
3 that you said it?
4 A. No, I just don't remember it now.
5 Q. Okay. Do you recall a conversation in which
6 you told June Chandler that some day Jordan was
7 going to be replaced by another one of Michael
8 Jackson's friends?
9 A. Yes.
10 Q. And you referred to these people as "special
11 friends," correct?
12 A. According to my transcript, yes.
13 Q. You don't ever remember using that phrase
14 now?
15 A. No.
16 Q. But you did use it in your transcript back
17 in 1993?
18 A. Yes.
19 Q. And in a conversation you told June Chandler
20 that with these special friends, that when Mr.
21 Jackson moves on to the next special friend, that it
22 has a tremendous emotional impact on the children
23 when they're no longer the favorite, correct?
24 A. As does everybody when they lose a friend.
25 Q. I'm sorry?
26 A. As does everyone if you lose a friend or a
27 friend becomes friendly with somebody else.
28 Q. Did you not, in that conversation, 9241

specifically refer to the situation where a young child was a friend of Mr. Jackson's and is replaced by another young child and that that has -- and you were reflecting upon the emotional problems it creates for that child?
A. Yes.
Q. Now, during the time that you were at the ranch -- you described a situation this morning for the jury, you told them that when you go to Neverland it's like walking through a door and you forget all your worries and all your cares.
A. Yes.
Q. That's a paraphrase so....
Now, it's also true that what happens at Neverland Ranch, is it not, that when children come on the ranch, they sort of lose all of their rules and guidelines for conduct?
A. Well, that depends on the child.
Q. Okay. With regard to the time you were at the ranch, the children that you saw were your son --
A. Yes.
Q. -- correct?
And your daughter, correct?
A. Yes.
Q. And you saw Jordan Chandler, correct?
A. Once.
Q. And you saw Macaulay Culkin? 9242

A. I don't think I've been there with Macaulay Culkin.
Q. Brett Barnes?
A. I've never been there with Brett.
Q. With regard to the conduct of your son when he was on the ranch, did he get carried away, do things there that he didn't do other places in terms of manners?
A. No.
Q. He was perfectly --
A. My son was always respectful, always considered it a privilege to be there.
Q. Did he ever do anything that you would think that would not be a good thing to do?
A. Not that I'm aware of.
Q. Are you aware that he was throwing pebbles or rocks at the lions with Mr. Jackson?
A. I think that's been paraphrased. I think what they did is they threw them at the cage, not the lion.
MR. SNEDDON: Move to strike as nonresponsive, Your Honor.
THE COURT: Overruled. Next question.
Q. BY MR. SNEDDON: So you make a distinction between throwing them at the cage and the lion itself?
A. Absolutely. They were just trying to make the lion roar. All it did was make a noise. 9243

Q. I see. How about -- does your son ride the
go-carts there?
A. Go-carts or the golf carts?
Q. The golf carts.
A. Yes.
Q. Ever have any problems with getting in any
accidents while he was there or driving too fast or
being admonished for driving too fast?
A. He may have been admonished for driving
fast. He was never in an accident.
Q. The other children that I've mentioned, did
you seem them acting out at all at Neverland Ranch?
A. I heard stories. I've never seen it.
Q. Now, when you testified about Mr. Jackson
and his special friends in your deposition, you
mentioned that the first of the ones that you knew
about was your son Wade in 1990, correct?
A. Yes.
Q. And then in 1991 was Macaulay Culkin,
correct?
A. Yes.
Q. And in 1992, Brett Barnes, correct?
A. I think so.
Q. And then in 1993, towards the end, was
Jordan Chandler, correct?
A. Yes.
Q. With regard to Brett Barnes, you went to
Chicago with your -- or I should ask you this: Did 9244

you go to Chicago with your son to shoot a commercial?
A. A music video, yes.
Q. And did you go there?
A. Yes.
Q. And with your son?
A. Yes.
Q. And did you meet Brett Barnes there?
A. Yes.
Q. And was Brett Barnes with the defendant?
A. Yes.
Q. And in fact, Brett Barnes was staying with the defendant in the defendant's room, correct?
A. I don't know.
Q. Did you see whether or not -- did you meet any of the Barnes' parents there?
A. His mother and his sister were there on the set.
Q. You sure of that?
A. Yes.
Q. And was it your -- you became aware of the fact that Mr. Jackson referred to some of these young boys as his cousins, correct?
A. Yes.
Q. And you were asked why Mr. Jackson referred to them as his cousins, correct?
A. I was asked?
Q. Didn't you say that Mr. Jackson used the 9245

term “cousins” because he didn’t want the kids to get jealous of each other?
A. Yes.
Q. Now, do you recall an incident that occurred where you were supposed to catch a plane and you couldn’t find your son?
A. Yes.
Q. And the fact is that you hadn’t seen or heard from your son for two or three days?
A. I think two.
Q. And he had been with Mr. Jackson during that entire time; correct?
A. Yes.
Q. And I believe what you said was you were upset and you were hurt by this, correct?
A. I don’t remember that.
Q. You called a number of people trying to locate your son, correct?
A. I was trying to call Michael, and he was in the recording studio, not answering, not receiving phone calls. And I think I called Neverland to see if they had gone to Neverland.
Q. Well, you called Neverland and you got the Quindoy -- Mr. Quindoy, correct?
A. I don’t remember.
Q. Do you know who Mr. Quindoy is?
A. Yes.
Q. And you were very upset and wanted your son 9246

to be returned so he could make the flight?
A. I called to ask if they perhaps were at
Neverland. That's all I remember.
Q. You don't remember saying that you needed
your son returned, that you were very upset and you
were going to miss the plane?
A. No, I don't.
Q. Did you call Norma Stakos trying to locate
your son?
A. Yes.
Q. So just to recap just a little bit, when you
were in Las Vegas, you went there by jet. Do you
know whose jet that was?
A. Steve Wynn.
Q. I'm sorry?
A. Steve Wynn's jet.
Q. Steve Wynn. And you went to a hotel?
A. Yes.
Q. Which is The Mirage?
A. Mirage.
Q. And you stayed in a suite?
A. Yes.
Q. And except for the night -- or the day when
you all stayed in bed watching cartoons, eating
popcorn, your son slept with Mr. Jackson and you
slept in the other room?
A. It was one night, yes.
Q. And now, when you came to the United States 9247

1 in 1991, in September, you came here on a --
2 originally you came here on a visa, temporary visa?
3 A. A six-month visitor's visa.
4 Q. Okay. And your goal was to stay here
5 permanently?
6 A. Yes.
7 Q. And your goal was that you came because Mr.
8 Jackson had indicated to you that he was going to
9 help your son in his career, correct?
10 A. I'm not sure about that.
11 Q. Do you remember testifying in your
12 deposition that the defendant had arranged deals for
13 Wade with his -- Sony records, Sony movies and Sony
14 T.V.?
15 A. No, that came after the fact. After we'd
16 been here. He didn't promise anything when we came.
17 He actually came to work on the "Black and White"
18 video.
19 MR. SNEDDON: Your Honor, move to strike the
20 comments. No question pending.
21 MR. MESEREAU: I'll object, Your Honor, the
22 prosecutor didn't allow her to complete her answer.
23 THE COURT: Sustained. The request to
24 strike is denied.
25 MR. MESEREAU: May the witness be allowed to
26 complete her answer, Your Honor?
27 THE COURT: Yes.
28 Do you want your answer read back as far as 9248

1 you gave it?
2 THE WITNESS: No.
3 He came here originally in 1991 to work on
4 the “Black or White” video, and we stayed after
5 that. That was the reason for coming in the first
6 place.
7 Q. BY MR. SNEDDON: Okay. I want to ask it
8 again, just to be clear.
9 Did Mr. Jackson tell you, before you left
10 Australia, that he would help you in any way he
11 could with his record company, his movie company,
12 and his television company, and these were three
13 deals that he had organized with Sony, correct?
14 A. There were no deals organized. He did say
15 he would do what he could to help, but there were no
16 deals organized.
17 Q. Would it refresh your recollection if you
18 looked at your testimony before the grand jury?
19 A. There were no deals. If I testified -- I
20 don’t think I would have testified to that.
21 Q. Would it refresh your recollection if you
22 looked at it to see whether you testified to that?
23 A. Yes.
24 Okay.
25 Q. Does that refresh your recollection as to
26 what you told the grand jury?
27 A. No. I don’t remember that.
28 Q. You don’t remember telling them that he’d 9249

organized three deals for your son?
A. Well, he didn't, so I don't remember it.
Q. But that's what you said?
A. I don't know what I meant there. There was
nothing organized.
Q. Did you say in the grand jury that you
considered these arrangements to be a personal
commitment from Mr. Jackson directly to you?
A. No.
Q. You didn't say that?
A. I don't remember saying that. There was no
commitment.
MR. SNEDDON: May I approach, Your Honor?
Q. Would it refresh your recollection if I
showed you your testimony before the grand jury?
A. Yes.
THE COURT: Yes, you may approach.
MR. SNEDDON: May I approach?
THE COURT: Yes.
Q. BY MR. SNEDDON: It's just one line. Or two
lines.
Does that refresh your recollection as to
what you told the Santa Barbara County Grand Jury?
A. No.
Q. It does not at all?
A. No.
Q. But you did say that?
A. Obviously I did. I have no memory of it. 9250

Q. And when you came here in September 1991,
Mr. Jackson also helped you with some rent for the
first month, correct?
A. That was part of the video -- you're always
housed when you come to work on a music video.
Q. I think the question was did Mr. Jackson pay
for your rent the first month you were here?
A. Yes.
Q. Now, when you came here in September, you
also went to work for MJJ Productions, correct?
A. No.
Q. You -- let's see if I get this right. You
had a job in a -- cosmetics?
A. Yes.
Q. And because you were here on a certain kind
of visa, they couldn't pay you; is that correct?
A. They did pay me, but they paid me through
Michael Jackson's company.
Q. So your checks were from MJJ Productions?
A. Well, that makes it sound like MJJ
Productions was paying me. They were not.
Q. I just -- the question was, the checks came
from MJJ Productions?
A. They were diverted through Michael Jackson's
company.
Q. In other words, your company would pay them
the money, and then Mr. Jackson's company would pay
you the money? 9251

A. Yes.
Q. Just in all fairness. I'm not trying to
trick you.
A. Okay.
Q. And that arrangement was worked out with the
approval and the help of Mr. Jackson, correct?
A. I think so. I'm -- I mean, I didn't speak
to him about it. I spoke to Norma Stakos about it.
Q. Do you recall telling and testifying to the
fact that what actually happened in September of
1991 is that Mr. Jackson was your sponsor when you
came to the United States with your son?
A. Not initially. We were here for six months
and then he offered, he offered to sponsor after we
arrived.
Q. You mentioned to this jury that at some
point in time, you realized that your son was
spending time in bed with Mr. Jackson, correct,
sleeping in the same bed with Mr. Jackson?
A. Correct.
Q. Okay. And in fact, you indicated in prior
testimony that you realized that and knew that early
on in the relationship between your son and Mr.
Jackson, correct?
A. Correct.
Q. Okay. We're almost done.
Let's fast-forward a little bit to 1993.
You were -- you were at the ranch in 1993 and Jordan 9252

1 Chandler was there, correct?
2 A. Yes.
3 Q. And in 1993, that was the occasion of you
4 having the conversation with Mrs. Chandler that
5 you've described to the ladies and gentlemen of the
6 jury previously, correct?
7 A. Correct.
8 Q. And during this particular point in time,
9 not January, but in 1993, at some point, your son
10 was in the process of putting together an album deal
11 where he -- he or somebody with him would cut some
12 records, correct?
13 A. Correct.
14 Q. And the negotiations began on that deal
15 when?
16 A. From memory, June of '93.
17 Q. And I think you described that process as
18 about a six-month process?
19 A. Well, it varies. But that one took that
20 long, yes.
21 Q. And the deal was finally signed on December
22 6th, 1993, correct?
23 A. Correct.
24 Q. And the deal was signed with -- with MJJ
25 Productions, correct?
26 A. Correct.
27 Q. And in the deal, your son -- not your son --
28 the total deal was for $100,000, correct? 9253

A. The production company.
Q. Right. And your son's share of that was
$30,000?
A. Correct.
Q. And 15,000 of that was given as an advance?
A. I think so.
Q. And this was in December of 1993, correct?
A. I don't really remember. I think according
to the transcripts that's what it said.
Q. And you took -- well, let me go back. There
was a period of time -- where were you on
Thanksgiving? Do you remember where you went
Thanksgiving? Did you go to New York Thanksgiving?
A. I read the transcript. We were in New York
recording.
Q. Okay. With who?
A. With the production company and they were
recording for the album.
Q. Okay. And up until the point of
Thanksgiving of 1993, the record deal had not been
finalized yet between your son and their
representatives and Mr. Jackson's company, correct?
A. Correct.
Q. And there had been -- there had been some
delay in the signing of the contracts, correct?
A. Yes.
Q. And one of the things that had happened in
between the time that you first started negotiating 9254

the contracts in June or July and December 6 when you finally signed the contract with Mr. Jackson's company was that Jordan Chandler had gone to the Department of Social Services in the Los Angeles District Attorney's Office and reported that he'd been molested by Michael Jackson, correct?
MR. MESEREAU: Objection. Objection; assumes facts not in evidence.
MR. SNEDDON: I'm asking what she's aware of, Your Honor, and it has to do with motive and bias.
THE COURT: Just a moment.
MR. MESEREAU: No foundation.
THE COURT: The objection is overruled.
You may answer.
Q. BY MR. SNEDDON: You were aware of that, were you not?
A. Yes.
Q. And in fact -- well, let me ask you this: You know a person, or knew a person by the name of Anthony Pellicano, did you not?
A. Yes.
Q. And Mr. Pellicano was Mr. Jackson's private investigator, correct?
A. Correct.
MR. MESEREAU: Objection; beyond the scope.
THE COURT: Overruled.
Q. BY MR. SNEDDON: And Mr. Pellicano was the 9255

1 one who was holding up the deal, correct?
2 A. Correct.
3 Q. He told you that?
4 A. Yes.
5 Q. And the deal was finally signed on December
6 6th because the defendant intervened and said, “Go
7 ahead and sign the deal,” correct?
8 A. Correct.
9 Q. In the meantime, Mr. Pellicano had given you
10 a $12,000 loan, correct?
11 A. 10,000.
12 Q. 10,000, you’re right. Absolutely. Pardon
13 me. $10,000 loan?
14 A. Correct.
15 Q. And did you ever repay that?
16 A. Yes.
17 Q. When?
18 A. I don’t remember.
19 Q. Do you have any proof?
20 A. Probably. I don’t remember when it was.
21 Q. When’s the last time you saw Mr. Pellicano?
22 A. I haven’t seen him since. I have not seen
23 him since ‘93.
24 Q. Since ‘93. So it’s your testimony you paid
25 him back in ‘93?
26 A. It was sometime after that.
27 Q. Mr. Pellicano was Mr. Jackson’s investigator
28 and you had at least four conversations with him, 9256

1 interviews, you and your son, correct?
2 A. Probably.
3 Q. And that was after Mr. Jackson got back in
4 December of 1993?
5 A. I don't remember.
6 Q. You were asked by Mr. Feldman to give a
7 statement to an investigator, and you refused -- for
8 his office, and you refused to do that, didn't you?
9 A. I don't remember. I'm sorry.
10 Q. Do you remember the Los Angeles Police
11 Department coming to your apartment?
12 A. Yes.
13 Q. And you didn't give them a statement either,
14 did you?
15 A. Yes.
16 Q. You gave them a very brief one and then said
17 you had to go somewhere. Isn't that what happened?
18 A. No, they were trying to interview Wade
19 without me and I told them they were not to do that.
20 Q. Was there some concern on your part that
21 trained law enforcement officers shouldn't talk to
22 somebody who could possibly be a suspect (sic) of a
23 crime?
24 A. I was concerned of manipulation.
25 Q. That the consequence, law enforcement would
26 manipulate your son?
27 A. Absolutely.
28 Q. You felt that your son could be manipulated 9257

easily?
A. No, but I wasn't going to take that chance.
He was ten.
Q. You weren't concerned about the fact that
the defendant in this case, Mr. Jackson, might
manipulate your son?
A. No concern at all that he would manipulate
my son.
Q. But two law enforcement officers, you
thought they would?
A. Possibly. I don't know them. I know Mr.
Jackson.
Q. Okay. Now, you received another -- you
received actually a loan from Mr. Jackson for
$10,000 in 1992, correct?
A. Yes.
Q. You never paid that one back?
A. No.
Q. And did you receive another loan from Mr.
Jackson after the record contract was signed?
A. I don't think so.
Q. Do you recall telling an investigator that
you had gotten a loan from Mr. Jackson for $10,000
and you tried to buy a car? Do you remember that?
A. He paid -- he paid for the balance of the
car.
Q. Mr. Jackson did?
A. Yes. 9258

Q. That was $10,000?
A. Yes.
Q. Now, in December of 1993, after the allegations with Jordan Chandler had surfaced, Mr. Jackson came back to the United States, correct?
A. Yes.
Q. And on -- to your knowledge, on the very first night he was back he called your son, correct?
A. He called me.
Q. He called you?
A. I think so. From memory.
Q. Do you remember testifying that you weren't at the house when the call was made, that you were out with some ladies?
A. I do remember reading that, I'm sorry.
Q. So you weren't there?
A. Possibly.
Q. You came home, and then both of you, late in the night, drove to Neverland Valley Ranch, correct?
A. Correct.
Q. When you got to Neverland Valley Ranch, it was about 1:30 in the morning, correct?
A. Correct.
Q. When you got there, you went to the guest quarters and your son went to Mr. Jackson's bedroom, correct?
A. I don't remember where I slept, but he did go to Michael's bedroom. 9259

Q. But he went inside the house?
A. Yes.
Q. Where was your son going to school when school started in September of 1993?
A. I think he was doing home schooling by then.
Q. Do you remember him at some point in time going to school with a family named the Kennedys?
A. No.
Q. He had a close friend?
A. No.
Q. Do you remember a young boy by the name of Teja, T-e-j-a?
A. No.
Q. Is the reason that you took your son out of school because the kids at school had found out that he had been sleeping with Michael Jackson and they were making cruel statements about him?
A. I took Wade out of school after the fourth grade. He was -- it was before any of this surfaced.
Q. So he was not in school during the fifth and sixth grades in the valley?
A. Never been in school in the valley.
MR. SNEDDON: Okay. May I have a moment? Excuse me just a second, Your Honor, I'm trying to find a report.
Okay, let's just do it this way. Ahh, here it is. 9260

Q. Kenneth Clark, I'm sorry. Do you know
Kenneth Clark.
A. No.
Q. You don't remember Kenneth Anthony Clark
being a good friend of your son's?
A. Never heard of him.
Q. Did your son ever go to Garden Street School
in West Hollywood?
A. He went there for the fourth grade.
Q. Just the fourth grade?
A. Yes.
Q. Not the fourth, fifth and sixth grades?
A. No. He started with Laurel Springs School
when he was -- when he got the record deal.
Q. Yeah, 1993.
A. He was fifth grade.
Q. So it's your testimony that your son was
only there in the fourth grade?
A. From memory. Maybe part of fifth.
Q. And is your testimony that your son never
received -- that the home school didn't start at
Laurel Springs because of the fact that your son was
being teased at school because people found out he
was sleeping in bed with Mr. Michael Jackson?
A. He's never been teased at school. He
started home-schooling because he was a recording
artist and could not be in school. He was
traveling. 9261

Q. I just asked you is that the case?
A. That's the absolute case.
MR. SNEDDON: Okay. Thank you. No further
questions.
THE COURT: Redirect?
MR. MESEREAU: Yes, please, Your Honor.

REDIRECT EXAMINATION
BY MR. MESEREAU:
Q. Miss Robson, in response to the prosecutor's
questions with regard to manipulation you said, "I
know Mr. Jackson." Do you remember saying that?
A. Absolutely.
Q. Please tell the jury what you meant by that.
A. Well, I've known Michael for a long time. I
know him very well. I've spent many hours talking
to him about everything. I feel like he's a member
of my family. I know him very well. I trust him.
I trust him with my children.
Q. Why?
A. Because Michael is a very special person.
Unless you know him, it's hard to understand. He's
not the boy next door. He's Michael Jackson. He's
very -- he's just a very unique personality. He
loves children. And he has a very pure love for
children. And to know him is to love him and to
trust him.
Q. And when did you begin to know Michael 9262

Jackson?
A. I felt like I knew him from the very beginning. He just has that wonderful way of making you feel at home; that I felt like I knew him very early on.
But particularly in the two years when we were living in Australia before we moved here, and I talked to him every day. We had very long conversations about everything that was going on in his life and my life and my children's lives. And you get to know someone very well when you talk to someone several hours a day over a two-year period. And then once we moved here, too, we continued that. We've always been able to talk about just about anything.
Q. Now, the prosecutor asked you about Mother's Day at Neverland?
A. Yes.
Q. Remember that?
A. Yes, I do.
Q. And you learned that Wade and Mr. Jackson were in a recording studio that day, correct?
A. Not that day. That was -- that was the time that we were staying in Westwood, and Wade and I had our ticket booked to return to Australia. And he had been at the recording studio with Michael for a couple of days, and I just hadn't heard from them. I know that they were working long hours, and then 9263

they'd take off again the next day. And I was getting --

MR. SNEDDON: Move to strike as a narrative, Your Honor. Objection.

THE COURT: Sustained.

Q. BY MR. MESEREAU: Do you remember anything else about that day at the recording studio?

A. No, just -- I had called Norma looking for him, and she found them. She said they were in the recording studio and, "Michael is bringing him back to you. They're on their way."

Q. To your knowledge, did your son spend a lot of time with Michael Jackson at recording studios?

A. Often, yes.

Q. And why was that?

A. Because Wade was interested in being a recording artist, he was interested in being a producer. He was learning. He loved to be around that and absorb that. He was like a sponge. And he -- that was the relationship that he and Michael had. It was -- a lot of it was a working relationship and Michael was teaching him.

Q. Now, the prosecutor asked you questions suggesting that you were allowing your son to be with Michael just to further his career. Is that true?

A. Absolutely not.

Q. What do you mean? 9264

A. He was -- as I say, he was learning things from Michael. Michael was teaching him everything he knew, and he couldn't -- that was part of the friendship, but it was more of a friendship than anything else. And I certainly never asked Michael for anything where my son's career was concerned. I believe in my son, and I moved here for him to further his career. I believed that he could do that.

MR. SNEDDON: Objection, Your Honor, narrative.

THE COURT: Sustained.

Q. BY MR. MESEREAU: Did you allow your son to spend time with Michael Jackson learning the entertainment business?

A. Absolutely.

Q. Why did you do that?

A. Because he was learning from the best. Michael offered to teach him everything he could. He believed in him, so why would I not?

Q. Now, your son has had a pretty successful entertainment career so far, right?

A. He has.

Q. And has he worked exclusively with Michael Jackson or has he done other things on his own?

A. He's done most of it on his own.

Q. What has he done?

A. He's become a choreographer. He started -- 9265

MR. SNEDDON: Object as immaterial, Your Honor.
THE COURT: Sustained.
Q. BY MR. MESEREAU: Well, the prosecutor suggested that you were making decisions about what to do with your children because Michael Jackson could help their careers, correct?
MR. SNEDDON: Your Honor, I'm going to object as argumentative and leading.
THE COURT: Sustained.
Q. BY MR. MESEREAU: Did you ever allow Wade to be with Michael Jackson only because Michael Jackson could help his career?
MR. SNEDDON: Object as leading.
THE COURT: Overruled.
You may answer.
THE WITNESS: Never. We were friends first.
Q. BY MR. MESEREAU: Why did you allow Wade to spend a lot of time with Michael Jackson?
MR. SNEDDON: Object.
Q. BY MR. MESEREAU: Please tell the jury.
MR. SNEDDON: Asked and answered.
THE COURT: Overruled.
Q. BY MR. MESEREAU: Please tell that to the jury.
A. They enjoyed each other. They -- they were very similar people. I remember Michael telling me early on that it was like looking in the mirror, he 9266

saw himself all over again. His interest was
because he saw Wade's potential. And Wade loved
everything that Michael did and wanted to learn as
much as he could.
Q. Did you ever lose your trust in Michael
Jackson during any point in time that your son was
with him?
A. Never.
Q. Did Mr. Jackson ever do anything that made
you suspicious about his behavior towards your son
Wade?
A. Never.
Q. Did Mr. Jackson ever do anything that made
you suspicious about his behavior towards your
daughter?
A. Never.
Q. Now, the prosecutor asked you questions
about children being jealous if Michael Jackson had
another friend who was a child. Do you remember
those questions?
A. Yes.
Q. Please tell the jury what you meant.
A. It's like any child who has a favorite uncle
or someone in the family that everyone wants to be
around.
And Michael's the sort of person that
everybody wants to be around. He has that sort of
aura. So naturally, when he was spending time with 9267

1 one child, another child would be jealous. It's the
2 same in any family, if you spend time with one child
3 more than the other.
4 MR. SNEDDON: Your Honor, I'm going to
5 object.
6 THE COURT: Sustained.
7 Q. BY MR. MESEREAU: The prosecutor asked you
8 questions about Michael Jackson having special
9 friends who were children. Do you remember that?
10 A. Yes.
11 Q. And what did you mean by that?
12 A. Well, you know, there would be people who
13 would spend time with him at particular times more
14 so than others.
15 It didn't mean that he didn't still spend
16 time with all of them. They were all friends of
17 his. But when he spent particularly more time with
18 one than the other, then they were special for the
19 time.
20 Q. Based upon what you've observed of Mr.
21 Jackson, would it be accurate to say that all over
22 the world children flock to him, don't they?
23 A. Absolutely.
24 MR. SNEDDON: Object. Immaterial; leading.
25 THE COURT: Overruled. The answer is in.
26 Q. BY MR. MESEREAU: And have you seen children
27 from time to time get jealous because Mr. Jackson is
28 being nice to another child? 9268

A. Yes.
Q. Has that ever appeared unusual to you?
A. Not at all.
Q. Did you ever see something that you thought was very suspicious when one child would get jealous of Mr. Jackson's attention to another child?
A. No, I think that's normal with children.
Q. When you used the term "special friends," what did you mean?
A. I think just the one that he was spending time with for now. That he considered all of his friends special.
I don't know why I would have said that.
I don't remember saying "special." But I imagine it would have meant just the child that he was spending time with now.
Q. When you used the term "special friends," did you mean to suggest anything criminal was going on?
A. Absolutely not.
Q. When you used the term "special friends," did you mean to suggest that anything sexual was going on?
MR. SNEDDON: Your Honor, that's a leading question. I object.
THE COURT: Sustained.
Q. BY MR. MESEREAU: The word "special," you used that term, right? 9269

A. Apparently, yes.
Q. Why?
A. Well, I guess because all children are special and Michael considers them all special. There's nothing -- no -- nothing necessarily of a bad connotation in that.
THE COURT: I think it's time for the break now.
MR. MESEREAU: Oh.
THE COURT: You just took that one breath too long.
MR. MESEREAU: Okay.
THE COURT: (To the jury) You know, I'm going to take -- you're going to get an extra five minutes because at the end of our break I want to talk to the attorneys. Just so you know, you'll have a little longer break. It's not a long item. Don't worry.
(Recess taken.)
--o0o--

REPORTER'S CERTIFICATE

THE PEOPLE OF THE STATE)
OF CALIFORNIA,)
Plaintiff,)
-vs-) No. 1133603
MICHAEL JOE JACKSON,)
Defendant.)

I, MICHELE MATTSON McNEIL, RPR, CRR, CSR #3304, Official Court Reporter, do hereby certify:

That the foregoing pages 9210 through 9270 contain a true and correct transcript of the proceedings had in the within and above-entitled matter as by me taken down in shorthand writing at said proceedings on May 6, 2005, and thereafter reduced to typewriting by computer-aided transcription under my direction.

DATED: Santa Maria, California, May 6, 2005.

MICHELE MATTSON McNEIL, RPR, CRR, CSR #3304

SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF SANTA BARBARA
SANTA MARIA BRANCH; COOK STREET DIVISION
DEPARTMENT SM-2 HON. RODNEY S. MELVILLE, JUDGE

THE PEOPLE OF THE STATE OF)
CALIFORNIA,)
Plaintiff,)
-vs-) No. 1133603
MICHAEL JOE JACKSON,)
Defendant.)

REPORTER'S TRANSCRIPT OF PROCEEDINGS

FRIDAY, MAY 6, 2005

8:30 A.M.

(PAGES 9272 THROUGH 9437)

REPORTED MICHELE MATTSON McNEIL, RPR, CRR, CSR #3304
BY: Official Court Reporter 9272

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I N D E X

Note: Mr. Sneddon is listed as “SN” on index.
Mr. Zonen is listed as “Z” on index. Mr. Auchincloss is listed as “A” on index.
Mr. Mesereau is listed as “M” on index. Ms. Yu is listed as “Y” on index.
Mr. Sanger is listed as “SA” on index.

DEFENDANT’S
WITNESSES DIRECT CROSS REDIRECT RECROSS
ROBSON, Joy 9299-SN
9304-M (Further)
ROBSON,
Chantal 9306-M 9315-A 9330-M 9337-A
9339-M 9342-A (Further) (Further)
BARNES,
Marie Lisbeth 9343-M 9353-Z 9389-M 9391-Z

BARNES, Karlee 9396-M 9407-A 9415-M 9417-A

E X H I B I T S

FOR IN PLAINTIFF’S NO. DESCRIPTION I.D. EVID.

895 Sheet of photographs 9372
897 Handwritten letter 9380

(The following proceedings were held in open court outside the presence and hearing of the jury:)

THE COURT: I just know that you're about to call another witness, which, according to my list, would be Chantal Robson; is that correct?
MR. MESEREAU: That's correct, Your Honor.
THE COURT: And there was a motion to limit testimony on her and also on Karlee Barnes on the same documents. And I've reviewed those documents, and I'm not going to grant the motion. I'll decide the issues on a question-by-question basis.
But for your guidance, it seems, based on the attached police reports, that the information that's in those reports would be the type of information that he would be allowed to ask about.
MR. MESEREAU: Yes. Thank you, Your Honor.
MR. ZONEN: Your Honor, we also filed a motion with regard to Lisbeth Barnes. Is that one that the Court will address at some time?
THE BAILIFF: You can't be heard.
THE COURT: The Lisbeth Barnes issue, I will rule on that on a case-by-case basis. But I will order that the -- that she not be allowed to give opinions about her -- her opinions about how vigorous, et cetera, a prosecutor Mr. Sneddon is. I've already ruled that's out of bounds, not an 9275

issue in this case. It's not going to be a personal attack on him.
MR. MESEREAU: Your Honor, if I could just ask for guidance on that issue. Excluding personal attacks, certainly we can discuss with Mr. Sneddon their willingness to cooperate, what he said to them, et cetera, about these issues without making it a personal attack, can't we?
THE COURT: Within limits.
MR. MESEREAU: Yes.
THE COURT: The line there -- there is a probative issue there, but the line about personal -- her opinions of him --
MR. MESEREAU: Yes.
THE COURT: -- I won't allow that.
MR. MESEREAU: Yes.
THE COURT: So while we're doing -- I'm going to do one more that was there. Might as well cover it. I don't see this person on your list, though. You had a person named -- there was a question about witness Michael Viner, V-i-n-e-r.
MR. SNEDDON: That's --
MR. MESEREAU: Michael Viner. Michael Viner. V-i-n-e-r, Your Honor.
THE COURT: Yeah. He's not on the list, but --
MR. SANGER: I should address that.
MR. MESEREAU: I'll address it. 9276

THE COURT: What my ruling on that would be, I'm not going to allow him to testify about overhearing the opinion of Mr. Feldman as to veracity. That's not admissible.
MR. MESEREAU: If I may, Your Honor, I think we were going to file an opposition, which didn't get filed. Our position was going to be the prosecution allowed -- I believe, I will double-check.
THE COURT: I'll withhold that ruling if you intend to file an opposition.
MR. MESEREAU: We do.
THE COURT: That person's not on the list at this point. But that's where I was going with it based on just what the District Attorney had filed.
MR. SANGER: It should be filed now.
MR. SNEDDON: Judge, may I address the Court on a matter that I indicated to the clerk that I wanted to take up with the Court?
THE COURT: All right.
MR. SNEDDON: And I was told I could do it at a later time.
THE COURT: All right. What is the issue?
MR. SNEDDON: Discovery. We have a --
THE COURT: Does it relate to any immediate --
MR. SNEDDON: Yes.
THE COURT: -- witness right now? 9277

MR. SNEDDON: Yes. Not to this lady, but to the future of the day. And it -- I want to alert the Court that we have a very substantial problem, and I'd like to -- I know that the Court doesn't want to keep the jury waiting, but --
THE COURT: On which issue?
MR. SNEDDON: We got a list with three witnesses, Francine Orozco, Russ Birchim and Jimmy Van Norman. Francine Orozco --
THE COURT: What I'm going to do is -- what I'm thinking of doing is letting the jury go an hour or so early today, because there's another issue that Mr. Mesereau wants to take up, so that we can do that when they're not waiting in the hallway.
MR. SNEDDON: All right. Your Honor, then I just want to ask one other thing. And while I don't want to hold things up, but I believe that this witness and the witnesses yesterday have testified to their opinion about character. And we filed the brief this morning, so I was just going to ask, when she's excused, that she's subject to re-call. If the Court agrees with us, then we can then cross-examine her further on those topics.
THE COURT: All right.
MR. SNEDDON: Thank you.
THE COURT: The Court has not excused any witnesses yet. Our agreement was that the witnesses, unless specifically asked, I would not 9278

1 excuse them, they're still bound, because both
2 parties have indicated they want to -- they may want
3 to re-call witnesses. So no witnesses have been
4 excused except where I've specifically excused them,
5 and there are very few of those.
6 MR. SNEDDON: Judge, I understand. I wanted
7 to make sure I preserved it as a witness coming back
8 on cross-examination and not having to call her as
9 my own witness. I believe that I would be entitled
10 to cross-examine her on have-you-heard statements
11 based on her testimony. That's all I was trying to
12 do was just to preserve the record for that.
13 THE COURT: All right.
14 MR. SNEDDON: Thank you.
15 THE COURT: I'll have the jury brought in.
16
17 (The following proceedings were held in
18 open court in the presence and hearing of the
19 jury:)
20
21 THE COURT: All right. You may proceed.
22 MR. MESEREAU: Thank you, Your Honor.
23 Q. Miss Robson, the prosecutor asked you
24 questions about borrowing $10,000. Remember that?
25 A. Yes.
26 Q. Would you please explain why you borrowed
27 $10,000?
28 A. The first $10,000, we had been here for, I 9279

1 think, a year, 18 months. And it was a lot more
2 difficult to establish ourselves here than I had
3 anticipated, so Michael offered to help us out for a
4 while. So we borrowed $10,000 at that point.
5 The second one was a car. I had been here
6 for a while. My credit from Australia cannot be
7 transferred, so I had no established credit in the
8 United States. I was listed as an employee because
9 of the cosmetics company paying through Michael
10 Jackson's company. Because I was being sponsored by
11 MJJ Productions, I was listed as an employee of the
12 company. So I had asked if the company would
13 co-sign for my car because I was unable to get the
14 credit to buy a car, and Michael just offered to pay
15 for it rather than co-sign.
16 Q. Was it -- as you recall, was it his idea to
17 help you or was it your idea?
18 A. I had asked for help. And he was there for
19 me. He was a friend.
20 Q. Okay. Was there anything, as far as you
21 know, improper or illegal about anything you did?
22 A. Nothing.
23 Q. Okay. The prosecutor asked you some
24 questions about whether or not you had borrowed
25 other funds. Do you remember?
26 A. Do you mean the Anthony Pellicano situation?
27 Q. Yes.
28 A. Yes. 9280

Q. And what were you referring to?
A. Well, that was because the record label --
the deal had been held up, and the advance was
something that we needed to survive. And because it
was held up, Anthony Pellicano offered to loan the
money to me until the balance came through from the
record deal.
Q. Okay. Now, did you ask Mr. Jackson for help
from time to time?
A. I asked a couple of occasions with the car
and the initial 10,000.
Q. And he did help you on those occasions?
A. Yes.
Q. The prosecutor asked you questions about
your son's entertainment career. Did you ask for
help from Mr. Jackson once in a while as far as your
son's entertainment career was concerned?
A. No. I had called a couple of time to see
if -- when he was doing music videos, to see if he
remembered Wade, because he said he would put Wade
in his music video. To remind him more than
anything. But that was all.
Q. And to your knowledge, did Mr. Jackson help
Wade with his career?
A. Yes, he's always very supportive. He's
always very interested in what Wade did with his
career. He would check on him. He would ask him to
send him -- keep him in touch and send -- when he 9281

was doing music production, he would ask him to send
him demos of the music that he was producing so that
he can listen to it and encourage him and teach him
what he was doing correctly and not. Always very
supportive, always very interested.
Q. Now, were you allowing Wade to spend nights
with Mr. Jackson because you just wanted to further
his career?
A. No.
Q. Why were you letting Wade spend those
evenings with Mr. Jackson?
A. Those evenings just happened because they
were having fun together. They would play till all
hours of the night. They would watch music videos.
They would watch cartoons. And they'd basically
just go to sleep.
Q. Did you do that with Mr. Jackson as well?
A. Yes, I did.
Q. How often?
A. A couple of times.
Q. Okay. The prosecutor asked you questions
about Wade and Michael throwing some pebbles at the
lion cage. Do you recall that?
A. Yes.
Q. How -- when did you learn about Wade and
Michael throwing some pebbles at a lion cage?
A. I think Wade had told me about it at some
point after the fact. He was basically telling me 9282

that he heard the lion roar. And it didn't roar very often, so I was surprised. And he told me what they did to make it roar.
Q. Well, was it your impression that they were engaging in animal cruelty or anything?
A. Absolutely not. That's the last thing that either of them would do.
MR. SNEDDON: I'm going to object.
THE COURT: What was that?
MR. SNEDDON: I said I object. It calls for a conclusion. It's narrative. And it's leading.
MR. MESEREAU: I think the prosecutor asked her about her knowledge and state of mind.
MR. SNEDDON: I'm not objecting to the subject matter. I'm objecting to the form of the question.
THE COURT: All right. I'll sustain the objection. Strike the answer. Next question.
Q. BY MR. MESEREAU: Who told you about Wade and Michael Jackson throwing some pebbles at the lion cage?
A. Wade.
Q. And when did he tell you about that?
A. I think possibly a day or two after it happened, or that night. I really don't remember.
Q. And did he tell you that he had tried to be cruel to an animal?
A. No. Wade loves animals. 9283

Q. Did he tell you that Michael Jackson had tried to be cruel to an animal?
A. No. Michael is -- loves all animals as well. Neither of them would ever do that.
Q. Now, the prosecutor asked you questions about the word “cousin.” Do you recall those questions?
A. Yes.
Q. And did you hear Michael Jackson use the word “cousin” in describing children?
A. Yes. He pretty much called everybody cousins, I think.
Q. And did you know why he did that?
A. No. That’s just something that he -- I mean, I think at some point he may have said it so that they weren’t jealous of each other, because that tended to happen.
Q. Did you ever suspect there was something criminal about Mr. Jackson using the word “cousin”?
A. No.
Q. Ever think there was something sexual about Mr. Jackson referring to children as his cousin?
A. Never.
Q. Ever think there was anything inappropriate about Mr. Jackson referring to various children as “my cousin”?
A. No.
Q. The prosecutor asked you questions about 9284

Brett Barnes. Do you know Brett Barnes?
A. I don't know him. I'm associated with him.
Q. Okay. How so?
A. I met him once when he was in Chicago and
Michael was shooting the "Jam" music video.
Q. Did you maintain any communication with the
Barnes family through the years?
A. No.
Q. Would you call the Barnes family good
friends of your family?
A. Not at all.
Q. Okay. How many times do you think you've
traveled with Mr. Jackson?
A. Just the once, to Las Vegas.
Q. Okay. Now, you referred to Chicago at one
point in your testimony.
A. Yes.
Q. Did you go to Chicago?
A. Yes.
Q. And what was the purpose for that trip?
A. Wade was dancing on the music video "Jam."
Q. Okay. And was that a music video involving
Mr. Jackson?
A. Yes.
Q. And was Mr. Jackson in Chicago with you?
A. Not with us. He was there.
Q. Okay. And what do you mean by "not with
us"? 9285

A. Well, we weren't staying with him. We were flown in as Wade was working. And we stayed at a hotel. He did the job, and we returned to Los Angeles.
Q. And to your knowledge, where did Mr. Jackson stay on that trip?
A. I have no idea.
Q. Did you see Mr. Jackson on that trip?
A. On the set, yes.
Q. Did you see him in any other location?
A. No.
Q. Okay. Do you know approximately when that was?
A. I'm not sure. I want to say '92. Maybe in the middle of '92 somewhere.
Q. Okay. The prosecutor asked you some questions about whether you were concerned about manipulation. Remember that?
A. Yes.
Q. Were you ever concerned about Mr. Jackson manipulating you?
A. Never.
Q. Did you ever tell anyone you were concerned that Mr. Jackson was manipulating Wade?
A. No.
Q. Ever tell anyone that you were concerned that Mr. Jackson was manipulating your daughter?
A. No. 9286

Q. Did you use the word “manipulation”?
A. Not to my knowledge.
Q. Are there any other entertainment-related transactions that you recall either you or your son being involved in with Michael Jackson?
A. And what do you mean by “entertainment transactions”?
Q. Any type of entertainment, transaction, project. You name it.
A. He did three music videos. He did a Pepsi commercial. And the original L.A. Gear photo shoot. I think those are the only things he’s ever done with Michael.
Q. Did Mr. Jackson, to your knowledge, help Wade with those projects?
A. What do you mean by “help”?
Q. Any kind of assistance.
A. I mean, he offered -- he decided that he wanted -- he would want Wade to work on it, because he was the best person for the job. Other than that, no.
Q. Okay. And to your knowledge, when is the last time Wade worked with Mr. Jackson on any entertainment-related project?
A. The last thing he -- Michael performed with ‘N Sync I think on an MTV Music Awards, and Wade was choreographing and directing it. He put that together. 9287

Q. Do you know approximately when that was?
A. I want to say 2000, something like that.
Q. Now, you said that many times you went to Neverland and Mr. Jackson wasn't there, right?
A. Yes.
Q. And when you did that, how would you arrange to visit Neverland?
A. Through his office. Through Evvy.
Q. Had Mr. Jackson given you permission to visit Neverland when he wasn't there?
A. Yes.
Q. And approximately when did he say you could do that?
A. He's always said that, that we're welcome any time.
Q. And I believe you testified that you were there more times when he wasn't there than when he was there; is that right?
A. Absolutely, yes.
Q. How many times do you think you visited Neverland when Mr. Jackson wasn't even there?
A. Maybe 40, 50 times.
Q. And where would you stay when Mr. Jackson wasn't at Neverland?
MR. SNEDDON: Object as immaterial, Your Honor.
THE COURT: Overruled.
You may answer. 9288

THE WITNESS: Before he had the children, I would stay in the house. But since he's had the children and they're now the children's bedrooms, we stay in the guest units.
Q. BY MR. MESEREAU: How many times do you think you stayed in Mr. Jackson's main house before Mr. Jackson had his own children?
A. Maybe 15, 20 times. I'm not sure.
Q. And where would you typically stay?
A. In the rose bedroom.
Q. Please describe to the jury what the rose bedroom is.
A. Its a large-sized bedroom with an adjoining bathroom. Hardwood floors. Beautiful wood -- carved wooden ceilings. Overlooks the front of the house. It's on the second floor.
Q. And how far away is the rose bedroom from Mr. Jackson's bedroom?
A. Mr. Jackson's bedroom is on the ground floor. I don't know how to describe how far away. It's probably the length of two rooms, but on another floor.
Q. Now, do you recall freely walking in and out of Mr. Jackson's bedroom?
A. Yes.
Q. And when you say "bedroom," you're talking about these two levels?
A. Yes. 9289

Q. Okay. Did Mr. Jackson ever put any restrictions on your walking in and out of his own room?
A. No.
Q. And you freely walked in and out of his own room?
A. Yes.
Q. The prosecutor asked you questions about a lock and alarm. Do you remember that?
A. No. Oh, the chimes, yeah.
Q. Do you recollect your always having to go through a locked door to get into his room?
A. I mean, I would always knock first before I went anyway, so I don't have any idea whether the door was locked or not. But I would never just walk in. I would always knock and someone would open the door.
Q. What typically would happen when you'd knock?
A. Wade would answer the door, or Michael.
Q. Okay. And would someone open the door for you?
A. Do you mean --
Q. When you knocked and someone responded, would they typically open the door for you or would you open the door yourself?
A. I think someone would open it for me.
Q. Did you go into Mr. Jackson's room at all 9290

hours of the day?
A. At any time I wanted to, yes.
Q. Do you recall being in his room during the day?
A. Yes.
Q. Do you recall being in his room during the evening?
A. Yes.
Q. Do you recall being in Mr. Jackson's room late at night?
A. Yes.
Q. Did you ever get the feeling that somebody was trying to keep you out of Mr. Jackson's room?
A. No.
Q. Do you recall spending much time in Mr. Jackson's room at Neverland?
A. I have spent time in there on occasion watching television with them, but not often.
Q. Where would you typically watch television when you were in Mr. Jackson's room?
A. On the bed.
Q. Would that be the bed on the second level?
A. No. On the ground level.
Q. Okay. Now, the issue of Mr. Jackson helping you with an automobile, when did that happen?
A. I think maybe '93. Early '93.
Q. And did you go to him and ask for some assistance in getting an automobile? 9291

A. Yes.
Q. Okay. And what was his response?
A. Well, I had asked him to co-sign. I wasn't asking for money. I was just asking for a signature. And his response was, "Well, why don't I just pay for it."
Q. And did he do that, to your knowledge?
A. Yes.
Q. Did you feel that he was doing that because he wanted something in return in any way?
A. Not at all.
Q. Did you feel there was any quid pro quo when he helped you with the car?
A. Absolutely not.
Q. Did you feel there was any quid pro quo when he helped you with money?
A. Never.
Q. Did you feel there was any quid pro quo when he helped you as a sponsor?
A. Not at all.
Q. Now, what was this issue -- you needed him as a sponsor for what purpose?
A. To remain in the United States. We -- permanent residence. To be able to have a green card, we had to have someone sponsor us into the country.
Q. Did you go to him and ask him if he would be your sponsor? 9292

A. I talked to him about it, and he said he would do whatever he could to do. He just instructed his office to do whatever was needed.
Q. To your knowledge, what was done to help you?
A. An offer -- they put me on their books as an employee of the company.
Q. Did Mr. Jackson have to actually sign anything to be your sponsor, if you recall?
A. Yes.
Q. And did you ask him to do that?
A. Yes. Pretty much. Basically I asked for help. So that was the only way we could stay, so, yes.
Q. And he did help you, right?
A. Yes, he did.
Q. Did you feel like you owed him anything after he helped sponsor your family to stay in the U.S.?
A. No. Not at all.
Q. Now, you received some payment through Michael Jackson Productions; is that right?
A. My earnings from the cosmetic company was diverted through the company, through his company, yeah.
Q. What cosmetics company was that?
A. Pigments. P-i-g-m-e-n-t-s.
Q. Where is that company located? 9293

A. On Burton Way in Beverly Hills.
Q. And you actually were working there?
A. Yes.
Q. When did you begin working at that cosmetics company?
A. I think ‘93. ‘92 or ‘93.
Q. And the idea was that because you weren’t a resident, you were not supposed to be employed; is that the idea?
A. I was on a working visa, but it was through MJJ Productions. I was -- I was employed to be employed by MJJ Productions only. So I managed to find this job for myself. And in order to make it legal, it had to be diverted through MJJ Productions.
Q. And where were you living at the time?
A. I was living in Hollywood.
Q. And who else was living there with you?
A. Chantal and Wade.
Q. And were you the main person providing for your family at that point?
A. Yes.
Q. You needed a job, didn’t you?
A. Yes, I did.
Q. Mr. Jackson helped you get a job, correct?
A. Well, he helped me, yeah. I mean, he didn’t get the job for me. I got the job, but he made it possible for me to be allowed to do that, yes. 9294

Q. And how long did that arrangement last?
A. Oh, I think three years.
Q. Okay. So for approximately three years you were paid through MJJ Productions, right?
A. Yes.
Q. Michael's Jackson's company?
A. Yes.
Q. Were you the primary wage earner for your family at that point?
A. Yes.
Q. And why did that arrangement end?
A. Wade booked a feature film. He was working as an actor on a feature film. And because he was a minor, I had to be there with him. So I left the job and worked with him on the film.
Q. Okay. And did Mr. Jackson ever ask anything in return for what he had done for you during those three years?
A. No.
Q. Ever feel you had to repay him for any of that?
A. No.
Q. Now, you spoke to Mr. Sneddon before today, did you not?
A. Yes.
Q. And you were actually questioned by Mr. Sneddon before today, correct?
A. Yes. 9295

Q. When were you questioned by Mr. Sneddon?
A. Before the grand jury, I think in ‘93 or ‘94.
Q. Was that the only time?
A. Yes.
Q. And do you recall Mr. Sneddon trying to get you to agree that your son had been kidnapped by Michael Jackson?
MR. ZONEN: I’m going to object. Argumentative; hearsay; and irrelevant.
MR. SNEDDON: It’s my objection.
MR. ZONEN: Oh.
MR. SNEDDON: Let me do it this way. I object. Same basis.
THE COURT: I’ll sustain both of you.
Q. BY MR. MESEREAU: To your knowledge -- all right. To your knowledge, has your son ever been held against his will by Mr. Jackson?
A. Never.
Q. To your knowledge, has your son ever been kidnapped by Mr. Jackson?
A. No.
Q. To your knowledge, has your son ever been abused by Mr. Jackson?
A. No.
MR. SNEDDON: Your Honor, object. Leading; asked and answered.
THE COURT: Sustained. 9296

Q. BY MR. MESEREAU: The prosecutor asked you questions about seeing June Chandler at Neverland. Do you remember that?
A. I do.
Q. Did you see her at Neverland?
A. I did.
Q. Did you talk to her at Neverland?
A. Yes.
Q. Was she a friend of yours?
A. No.
Q. You didn't care for her, right?
A. I did not.
Q. Why?
A. My impression of June Chandler was that she wanted to be mistress of Neverland; that she was ordering the staff around as if she owned Neverland; that she wanted everything that went with it. My impression of June Chandler was that she was a gold-digger.
Q. Did you see her interact with Mr. Jackson?
A. Yes.
Q. Did you feel she was trying to use Mr. Jackson?
A. Absolutely.
Q. Did you ever talk to Mr. Jackson about it?
A. No, I did not.
Q. The prosecutor asked you about someone named Blanca Francia. 9297

A. Yes.
Q. Did you know Blanca Francia?
A. I don't know her. I remember her working there.
Q. Did you ever chat with her?
A. No.
Q. Do you remember seeing Blanca Francia in Mr. Jackson's room?
A. I remember seeing her go in there to clean. I don't remember seeing her in there.
Q. Do you recall being at Neverland when large numbers of children would visit?
A. Yes. Once.
Q. And when was that?
A. I don't remember when it was. It was -- I'm trying to work out about what age Wade would have been. It's probably around '99, 2000. There was a group of children there from the -- the Wish Foundation or Create-a-Wish Foundation.
Q. Did you spend time with those children?
A. Yes, I did.
Q. What did you do with those children?
A. We played with them on the -- in the amusement park.
MR. SNEDDON: Your Honor, beyond the scope of cross.
THE COURT: Sustained.
MR. MESEREAU: No further questions, Your 9298

1 Honor.
2
3 RECROSS-EXAMINATION
4 BY MR. SNEDDON:
5 Q. Miss Robson, you're not jealous of June
6 Chandler, are you, because she displaced you?
7 A. Not at all.
8 Q. Not at all?
9 A. Not at all.
10 Q. That wasn't the feeling you had at the
11 ranch, because she was in control?
12 A. Absolutely not.
13 Q. And her son had replaced your son?
14 A. My son was there.
15 Q. Yes, but he wasn't in the bedroom with
16 Michael Jackson anymore, was he?
17 A. I don't know that he wanted to be. He was
18 Michael's friend. They were there together as
19 friends. I had no wish to be June Chandler.
20 Q. Well, I didn't ask you whether you wished to
21 be June Chandler. I asked you whether you were
22 jealous of her position.
23 A. Certainly not. What position would that be?
24 Q. Of being able to be close to Michael Jackson
25 at that point in time.
26 A. I don't think she was close to Michael
27 Jackson at that time.
28 Q. You don't? 9299

A. No. As a matter of fact, Michael spent a good deal --
Q. Do you know --
MR. MESEREAU: Objection. She hasn't completed her answer, Your Honor.
THE COURT: Overruled. Next question.
Q. BY MR. SNEDDON: Do you know how many trips they went on together?
A. No.
Q. Do you know how long they spent with each other?
A. No.
Q. You have no idea, do you?
A. No.
Q. So you don't have any idea how close she was to Mr. Jackson at that point in time, no personal knowledge?
A. My personal knowledge from that weekend was when I saw Michael Jackson trying to elude June Chandler for the entire weekend.
MR. SNEDDON: Move to strike as nonresponsive, Your Honor.
THE COURT: Overruled.
Q. BY MR. SNEDDON: And you said that the defendant, Mr. Jackson here, was the person who easily created trust in people; is that right?
A. Yes.
Q. And in relationship to you and your family, 9300

he created that trust very easily and very quickly, correct?
A. Yes.
Q. You saw him do that with other people, too, correct?
A. No.
Q. You didn't?
A. No.
Q. You were the only ones that you observed him to be trust --
A. The only time I was ever around anybody else with Michael would have been on the set in Chicago with the Barnes family and that one weekend with the Chandler family.
Q. So your opinion about Mr. Jackson and his ability to form trust quickly and easily has to do simply with your family?
A. Yes.
Q. Now, did I understand you correctly that you stated that when you came to the country, your visa only allowed you to work for MJJ Productions?
A. Yes.
Q. Now, Mr. Mesereau asked you questions about were you aware of what was going on in the evening in Mr. Jackson's room. Do you recall that?
A. He asked me if I'd been into the room.
Q. In the evening.
A. Yes. 9301

Q. Now, you have no idea, once you left that room, what went on inside that bedroom, do you, of personal knowledge?
A. Only what my son tells me.
Q. Well, you don't know whether they were playing video games, correct?
A. If my son tells me they were, they were.
Q. Okay. I think I asked you of personal knowledge.
A. That is personal knowledge from my son telling me. I believe him.
Q. Something you saw with your own eyes or heard with your own ears, not from your son. Do you have any personal knowledge what went on behind those closed doors in that bedroom?
A. Not on every occasion. I was not there on every occasion, no.
Q. For instance, have you talked to Mr. Mesereau since the testimony yesterday?
A. No.
Q. Did you talk to him at all in preparation for your testimony?
A. We had a brief conversation about how things would be in the courtroom, yes.
Q. And did -- are you aware of the fact that at the time of the execution of the search warrant in this case at Neverland Valley Ranch, that there was a whole assortment of sexually explicit magazines 9302

and books that were found in Mr. Jackson's bedroom?
MR. MESEREAU: Objection. Relevance; beyond the scope.
THE COURT: Sustained.
Q. BY MR. SNEDDON: You told Mr. Mesereau in response to his questions that you came to the country without any promises from Mr. Jackson; is that what you said?
A. That's my memory.
Q. That's not what you told the grand jury back in 1994, was it?
A. Well, I read something different. I don't remember that.
Q. Well, that was you testifying, wasn't it?
A. Well, I'm saying I don't remember it now. Apparently that's what I testified to.
Q. Under oath?
A. Verbal -- maybe they were verbal. What I'm saying is there were no contracts. There may have been something verbal.
Q. It didn't say that in your testimony, did it? It said, "Mr. Jackson had arranged the following"?
A. Well, that's incorrect.
Q. But you said it?
A. Well, I'm sorry. I made a mistake back then. There was never anything verbal, never any contracts. 9303

Q. You remember better today than you did back then?
A. Apparently.
MR. SNEDDON: No further questions.

FURTHER REDIRECT EXAMINATION
BY MR. MESEREAU:
Q. In response to the prosecutor's questions, you said you believe your son?
A. Absolutely.
Q. Why do you believe what your son told you?
A. We just have a very close relationship.
MR. SNEDDON: Excuse me, I didn't ask any questions about believing her son. It's beyond the scope of examination.
THE COURT: I don't think it's beyond the scope. But it's an improper question. I'll sustain the objection.
Q. BY MR. MESEREAU: Could you clarify this issue of something being arranged when you came to the United States; what was arranged, what wasn't arranged?
A. Well, there were no contracts. I honestly don't know what I was referring to in the grand jury. Perhaps -- from my memory -- I mean, we're going back 12, 13 years.
From my memory, I remember Michael saying that he would help in whatever way he could. That 9304

he had movie companies. He had, you know, record companies. If there's something he could do, he would help. But there were certainly no arrangements. We came here and -- I mean, I had to get a job to work. There was no -- there were no contracts. There was nothing arranged. I didn't come here expecting Michael Jackson to give Wade a career.

Q. Has Mr. Jackson always been available to help your family when you needed some assistance?

MR. SNEDDON: Object, Your Honor. Beyond the scope and leading.

MR. MESEREAU: I don't think so, Your Honor. He talked about arrangements.

THE COURT: You may answer.

THE WITNESS: Michael's a friend. And like any friend, if we needed anything, he would be there, and -- and vice versa. We were there for each other as friends are.

MR. MESEREAU: No further questions.

MR. SNEDDON: No questions.

THE COURT: All right. Thank you. You're not being excused. There's an issue about some other questions that I'm going to take up, so you may be called back.

THE WITNESS: All right.

THE COURT: For now, you may leave.

THE WITNESS: Thank you. 9305

THE COURT: Call your next witness.
MR. MESEREAU: Yes. Defense will call
Lisbeth Barnes, Your Honor.
May I take a second?
She's not right here, so we will call
Chantal Robson, Your Honor.
THE COURT: All right.
When you get to the witness stand, please
remain standing.
Face the clerk here and raise your right
hand.

CHANTAL ROBSON
Having been sworn, testified as follows:

THE WITNESS: I do.
THE CLERK: Please be seated. State and
spell your name for the record.
THE WITNESS: Hi, Chantal Robson.
C-h-a-n-t-a-l; last name Robson, R-o-b-s-o-n.
THE CLERK: Thank you.

DIRECT EXAMINATION
BY MR. MESEREAU:
Q. Good morning.
A. Good morning.
Q. Ms. Robson, Joy is your mother, correct?
A. Yes, she is. 9306

Q. And Wade is your brother, right?
A. Yes.
Q. Do you know the gentleman seated at counsel table to my right?
A. I do.
Q. And who is he?
A. He's a friend of mine. Michael Jackson.
Q. And how long has he been a friend of yours?
A. Since I was ten years old.
Q. And how did you meet him?
A. First time I met him, a trip to America. We went to Record One Studios. He was a friend of my brother's.
Q. Okay. And have you stayed in contact with Michael Jackson through the years?
A. I have.
Q. How have you stayed in contact with him?
A. Just through phone calls. He would call and say hello to the family. And see him on occasions.
Q. And do you think he's a family friend?
A. I do.
Q. Okay. Now, when did you last speak to Michael Jackson?
A. When did I last speak to Michael Jackson?
Q. Yes.
A. A couple nights ago.
Q. Okay. And where was that?
A. At the ranch. 9307

Q. Were you visiting the ranch?
A. Yes.
Q. Okay. Were you with your mom?
A. Yes.
Q. Were you with your brother?
A. Yes.
Q. All right. Now, do you recall when you first visited Neverland Ranch?
A. I do.
Q. And approximately when was that?
A. This was ‘89. I was ten years old.
Q. And do you remember who was with you?
A. Yes. When we first went, it was my entire family. My grandparents, my father, my mother, Wade and myself.
Q. Okay. And do you remember where you stayed at Neverland?
A. I stayed in Michael’s room.
Q. Okay. And was anyone else in there with you?
A. Wade was and Michael was.
Q. And how many nights did you and Wade stay in Michael Jackson’s room on that occasion?
A. Two nights.
Q. Do you recall anything improper ever going on in that room?
A. Not at all.
Q. Okay. What -- what did you and Wade and 9308

1 Michael do during those evenings you stayed in his
2 room?
3 A. We just hung out. Watched cartoons.
4 Watched videos. Played games. You know, what
5 normal kids do. Hang out and have fun.
6 Q. Did you fall asleep on his bed?
7 A. Yes, we did.
8 Q. How many times do you think you've been in
9 Michael Jackson's room?
10 A. I've probably been there a lot of times,
11 just sort of in and out. I've slept there four
12 times.
13 Q. When you slept in Michael Jackson's room,
14 has your brother Wade always been there?
15 A. Yes.
16 Q. And any of those occasions, have you ever
17 seen anything improper go on?
18 A. Not at all.
19 Q. Ever seen Mr. Jackson molest your brother
20 Wade?
21 A. Not at all.
22 Q. Ever seen Mr. Jackson touch your brother
23 Wade in an improper way?
24 A. No.
25 Q. Ever seen Mr. Jackson abuse your brother
26 Wade?
27 A. No.
28 Q. Were you ever suspicious of any touching Mr. 9309

1 Jackson may have done with Wade?
2 A. Never.
3 Q. Has Mr. Jackson ever hugged you?
4 A. Yes, he has.
5 Q. Have you hugged him?
6 A. Yes, I have.
7 Q. Ever been suspicious of the way he hugged
8 you?
9 A. Not at all.
10 Q. Has Mr. Jackson ever kissed you?
11 A. Yes, he has.
12 Q. Have you kissed him?
13 A. Yes, I have.
14 Q. Ever been suspicious of the way Mr. Jackson
15 kissed you?
16 A. No.
17 Q. Ever seen Mr. Jackson hug Wade?
18 A. Yes.
19 Q. Ever been suspicious of the way Mr. Jackson
20 hugged Wade?
21 A. No.
22 Q. Have you ever seen Wade hug Mr. Jackson?
23 A. Yes, I have.
24 Q. Have you ever been suspicious of the way
25 Wade hugs Mr. Jackson?
26 A. No.
27 Q. Have you ever seen Mr. Jackson kiss Wade?
28 A. Yes. 9310

Q. Have you ever seen Wade kiss him?
A. Yes.
Q. Ever been suspicious of any of this kissing?
A. No.
Q. Ever thought any of it was sexual in nature?
A. No, it was just a friendly kiss on the cheek.
Q. How many times do you think you've been to Neverland?
A. Millions. I've been -- so many, I can't even remember.
Q. Okay.
A. If -- I think an average of four times a year.
Q. And have you been there when Mr. Jackson wasn't at Neverland?
A. Yes, I have.
Q. Have you been there a lot of times when he wasn't there?
A. Yes.
Q. The first time you were at Neverland, what do you recall your family doing?
A. We hung out. Watched movies. Ride on golf carts. Played in the playground. Ate dinner. Stuff like that.
Q. Now, to your knowledge, did your parents know that you and Wade were sleeping in Michael Jackson's room? 9311

A. Yes, they did.
Q. To your knowledge, did your grandparents know you and Wade were sleeping in Michael Jackson's room?
A. Yes, they did.
Q. Anyone ever have a problem with it?
A. No.
Q. How would you describe Michael Jackson's room?
A. It's beautiful. It's two floors. There's another bedroom upstairs. His bed is downstairs. There's two closets.
Oh, sorry.
Sorry, there's a closet on the right side and a shower on the left side.
Q. How many times do you think you've been in that room? Can you guess? Not "guess," excuse me. Can you estimate?
A. Five to ten times.
Q. During the times you've been to Neverland when Mr. Jackson was there, did you ever feel that you were being kept out of his room?
A. No.
Q. Have you been in his room during the daytime?
A. Yes, I have.
Q. Have you been in his room during the nighttime? 9312

A. Yes, I have.
Q. And you have been in his room late in the evening, correct?
A. Yes.
Q. Did Mr. Jackson ever put any restrictions on you not coming into his room?
A. Never.
Q. Now, the first time you visited Neverland when you and Wade stayed in Mr. Jackson's room, where did your parents stay, if you remember?
A. In the guest units.
Q. And where did your grandparents stay?
A. In the guest units also.
Q. Do you recall your parents staying in the main house before Mr. Jackson had his own children?
A. I think my mother did stay in the main house at one point.
Q. All right. Do you know that for sure?
A. I don't.
Q. Okay. Have you been through all the rooms in the main house?
A. Yes, I have.
Q. Okay. You've been through them many times?
A. Yes.
Q. Do you recall a Jacuzzi at Neverland?
A. Yes.
Q. Ever been in the Jacuzzi?
A. I have. 9313

Q. Ever been in there with Michael Jackson?
A. I have.
Q. Ever been in there with Michael Jackson and your brother?
A. Yes.
Q. Did you see anything improper go on when you were in the Jacuzzi?
A. No, not at all.
Q. Do you recall what Mr. Jackson was wearing when you were in the Jacuzzi with him?
A. Shorts.
Q. Have you traveled with Mr. Jackson?
A. No, I have not.
Q. To your knowledge, has your family traveled with him?
A. Yes.
Q. What is your knowledge about that?
A. I know that my brother and my mother have been to Vegas. I take that back. I have been to Los Angeles with him. On my first trip. I went to Los Angeles, just me and my mom. Sorry, me and my brother.
Q. What is your occupation?
A. I'm a dancer.
Q. Now, are you aware of any efforts Mr. Jackson made to help your family move to the U.S.?
A. Yes. He helped us, like any friend.
Q. What do you recall him doing? 9314

A. He basically just helps us with immigration.
Helped us, you know, get certain attorneys to help
us deal with moving over here.
Q. Did you ever feel that he was doing this
because he wanted something in return?
A. No. Never.
Q. Did he ever help you with your career?
A. No.
MR. MESEREAU: No further questions.

CROSS-EXAMINATION
BY MR. AUCHINCLOSS:
Q. Good morning, Miss Robson.
A. Good morning.
Q. You first met Mr. Jackson in 1990; is that
correct?
A. '89.
Q. '89. All right. And that was in Australia?
A. No. That was in America.
Q. All right. So the first time you met Mr.
Jackson was the time -- the first time that you
visited Neverland Ranch?
A. Yes.
Q. Did Neverland Ranch seem to you to be an
awe-inspiring place when you first visited it?
A. I'm sorry, an awe --
Q. Awe-inspiring.
A. Yes. It's a beautiful place. 9315

Q. Very impressive?
A. Yes.
Q. Were you impressed with meeting Mr. Jackson the first time you met him?
A. Not really impressed. I was young, so the idea of the fact that he was being famous really didn't mean anything.
Q. Okay. It didn't strike you as anything remarkable to meet a superstar at that time when you were ten years old?
A. No.
Q. Had you ever listened to his music?
A. Yes.
Q. Did you have any of his albums?
A. Yes.
Q. And then after your first visit to Neverland, you returned to Australia?
A. Uh-huh.
Q. With your family?
A. Yes.
Q. And your brother Wade?
A. Yes.
Q. And did Wade communicate with Mr. Jackson during that period of time?
A. Yes.
Q. Did he call him?
A. Yes.
Q. Did Mr. Jackson call Wade? 9316

A. Yes.
Q. Would this be a frequent occurrence?
A. Yes.
Q. And would they talk on the phone for hours?
A. Yes.
Q. Weekly?
A. Yes.
Q. More than once in a week?
A. Yes.
Q. During that period of time, did your brother seem to be fascinated with his relationship with this star?
MR. MESEREAU: Objection; vague.
THE COURT: Overruled.
You may answer.
THE WITNESS: He was fascinated with the friendship.
Q. BY MR. AUCHINCLOSS: It was something very important to him, wasn't it?
A. Yes.
Q. Did they send faxes back and forth?
A. Yes.
Q. How often would they do that?
A. I don't remember. It wasn't as often as the phone calls.
Q. But this was a very special bond that Wade had with Michael Jackson, wasn't it?
A. Like any other friend, yes. 9317

Q. But this was a special friend, wasn't it?
A. I don't know what you mean by "special."
Q. Well, did Wade have anybody else that he had a relationship with that you could compare to his relationship with Mr. Jackson?
A. Me.
Q. Okay. But let me paraphrase -- or let me rephrase that.
Any relationship with an adult like he had with Mr. Jackson, an adult who's not a member of his family?
A. No.
Q. And your first night at Neverland you stated that you slept in Mr. Jackson's bed?
A. Yes.
Q. Bedroom?
A. The second night. The first time I was in the room.
Q. All right. So the very first night that you went to Neverland you spent the night in Mr. Jackson's bedroom?
A. In his bedroom, yes.
Q. And on that first night, you slept downstairs in the bedroom, correct?
A. No.
Q. You slept upstairs?
A. Yes.
Q. Did you -- or I'll rephrase that. 9318

Were you interviewed by Scott Ross, an investigator for Mr. Jackson, on May 2nd, 2005?
A. Yes. Not quite sure if that was the date, but, yes.
Q. That was just a few days ago?
A. Yeah.
Q. And did you tell Mr. Ross that you recalled the first night that you slept downstairs, and Wade went upstairs and slept with Mr. Jackson?
A. No. It would be the other way around.
Q. Okay.
A. Michael and Wade slept -- Michael and Wade slept downstairs and I slept upstairs on the first night.
Q. All right. So Mr. Jackson and Wade slept together separately from the area that you slept in?
A. Yes.
Q. Why was that?
A. Because I left and went upstairs.
Q. Why did you leave and go upstairs?
A. Because I was a little older at that point and I felt like I was interfering in Michael's bedroom, so I left and went upstairs.
Q. Because you wanted to give Mr. Jackson some privacy?
A. Yes.
Q. And he was alone with your brother at that time? 9319

A. Yes.
Q. And your brother was seven years old?
A. Yes.
Q. And that night, your brother slept in the same bed with Michael Jackson?
A. Yes. I told him to come up with me.
Q. You told him to come up with you?
A. Yes.
Q. Was that because you felt like he shouldn't be sleeping in a bed with a grown man?
A. Not at all.
Q. Then why did you tell him to do that?
A. Because I didn't want to make Michael feel like two people were invading his space.
Q. Something about that first night made you feel uncomfortable, didn't it?
A. No, not at all.
Q. Didn't you say you felt more comfortable the second night to Mr. Ross when you spoke to him a few days ago?
A. Comfortable with my friendship with Michael, yes.
Q. And that next night, you slept in the same bed with Michael Jackson?
A. I did.
Q. And your mother knew about it?
A. Yes.
Q. He was 35 years old? 9320

A. Yep.
Q. And you were ten?
A. Yep.
Q. Was that the first time you'd ever done anything like that?
A. Done anything like what?
Q. As a young girl, sleeping with a grown man who's unrelated to you, that you just met.
A. That was the first time I'd ever done that. It's not the first time I've ever slept with somebody over 35.
Q. As a ten-year-old, did you sleep with someone over 35, other than Michael Jackson?
A. I've slept with my dad.
Q. I'm talking about an unrelated person.
A. No, that was the first time.
Q. As a child, how many unrelated men did you sleep with that were over the age of 30?
A. None.
Q. Just Mr. Jackson?
A. Other than my father, yes.
Q. Whose idea was it that you sleep in Mr. Jackson's bed?
A. It was actually our idea.
Q. Sorry?
A. My brother and I. It was actually not an idea. We just fell asleep.
Q. Did Mr. Jackson discourage this? Did he say 9321

in any way that this is not appropriate for two small children to be sleeping in the bed with a 35-year-old unrelated man?
A. No.
Q. And as you sit here today, as an adult, you think it's appropriate for a ten-year-old girl to sleep in the same bed with an unrelated 35-year-old man that she's just met?
A. I think it's appropriate for a ten-year-old girl to sleep in a bed with a friend.
Q. All right. What about a 35-year-old man that she has just met. That's my question. Do you think that's appropriate?
A. If she feels comfortable that he is a friend.
Q. If the ten-year-old thinks it's okay, she should do it?
A. And the parents. Yeah.
Q. Something you would allow?
A. Yes.
Q. What about a seven-year-old boy?
A. Yes.
Q. You would allow your own seven-year-old son to sleep with a 35-year-old man that he has just met?
A. If I trusted the man, yes.
Q. Do you think that type of trust can be earned in one day? 9322

A. I don't think trust is always earned.
Q. How do you gain trust, other than earning it?
A. I think it's a feeling. It's a friend.
Q. Mr. Jackson's pretty good at that, isn't he, at gaining trust?
A. I don't understand how you could say somebody's good at gaining trust.
Q. He makes you feel very comfortable when you first meet him; isn't that true?
A. I think it depends on who's meeting him.
Q. Well, you felt very comfortable, true, the very first day?
A. Well, I was his friend.
Q. And your mother felt very comfortable the very first day, true?
A. My mother had already met him two years prior.
Q. But she just met him as an acquaintance. You know that, right?
A. They spent a lot of time together before that, though.
Q. They had spent what?
A. They spent time together before that.
Q. On how many occasions?
A. Just the once when they were in Australia. But she actually spent hours and had conversation and got to know Michael, so she had a relationship 9323

1 prior.
2 Q. So your testimony is that your mother knew
3 you were going to be sleeping in the same bed with
4 Michael Jackson that night?
5 A. Yes.
6 Q. Did Michael Jackson ever refer to you as a
7 member of his family?
8 A. No.
9 Q. Did he ever refer to Wade as a member of his
10 family?
11 A. Not to my knowledge, no.
12 Q. Are you aware that there are other boys that
13 have spent the night in Michael Jackson's bed?
14 A. I am.
15 Q. Do you know their names?
16 A. Some of them.
17 Q. Which ones do you know?
18 A. Jordie Chandler, Macaulay Culkin and Brett
19 Barnes.
20 Q. Mr. Jackson has been very generous to you,
21 hasn't he?
22 A. It depends on what you mean by "generous."
23 Q. Well, he's allowed you the run of his ranch
24 anytime you wanted, true?
25 A. Yes.
26 Q. And he picks up the tab, correct?
27 A. The tab at his house. It's like me going to
28 any other friend's house and spending time there. 9324

Q. Neverland's not like any other friend's house, is it?
A. No, but I have a lot of friends that have beautiful homes. And when I go there, they allow me to eat for free.
Q. And Mr. Jackson has given your mother loans in the past?
A. Loans?
Q. Yes.
A. Yes.
Q. And at Neverland, you pretty much have -- get to do whatever you please as a child?
A. Well, I don't know about "whatever you please." I mean, you're protected. You can't --
Q. Within the bounds of safety.
A. Yes.
Q. You pretty much have the run of the ranch, true?
A. Yes.
Q. Get to stay up late?
A. Yep.
Q. Eat all the candy you want?
A. Yes.
Q. There are really no rules, are there, except for your safety?
A. Depending on whether your mother has certain rules for you or --
Q. But when you're away from your parents and 9325

when you're with Mr. Jackson, you get to do whatever you want?
A. Well --
Q. Pretty much, true?
A. As long as they're not what your mother's told you not to do.
Q. All of these families that you've mentioned spend time with Mr. Jackson, right, the boys of families?
A. Yes.
Q. And all of these families have one thing in common, don't they? They all have boys?
A. And sisters.
Q. Right. But each one has boys?
A. Yes.
Q. And each one of those families has a boy that forms a special relationship with Mr. Jackson; isn't that true?
A. Your idea of special relationship, yes.
Q. Well, Mr. Jackson had a relationship with Wade that was far closer than the relationship that you had with Mr. Jackson, true?
A. Yes.
Q. And Mr. Jackson chose Wade to sleep in his bedroom night after night after night?
A. I don't think Michael Jackson chose Wade to sleep in his bedroom.
Q. Well, he allowed it, true? 9326

A. There's a difference between allowing and choosing.
Q. Well, you don't really know what he chose, do you?
A. I think that we had the ability to leave.
Q. That's a "yes" or "no" question. Do you know what Mr. Jackson was choosing when he and Wade were sleeping in the same bed together?
A. No.
Q. Ever heard of the "Apple Head Club"?
A. No.
Q. Never?
A. Apple Head Club? No.
Q. How about the "Doo-Doo-Head Club"?
A. No.
Q. Have you ever heard those expressions?
A. Yes. Not "Club."
Q. Was Wade an "Apple Head"?
A. Yes.
Q. Do you know how many times Wade slept with Mr. Jackson alone in his bed?
A. I do not.
Q. And Miss Robson, you really have no idea what happened between Mr. Jackson and Wade on those many nights that they slept alone behind closed doors in Mr. Jackson's bedroom, do you?
A. Yes, I do.
Q. You weren't there, though, were you? 9327

A. It doesn't matter.
Q. You're just judging that based upon what Wade told you?
A. Based upon what my brother tells me and my friends tell me, yes. But just like anything, we base a lot on what people tell us.
Q. Would it surprise you to learn that there has been an expert who testified in this case that up to 50 percent of all children --
MR. MESEREAU: Objection to the question.
MR. AUCHINCLOSS: I haven't finished the question.
MR. MESEREAU: Referring to other testimony.
MR. AUCHINCLOSS: Based to challenge her credibility.
THE COURT: Sustained.
Q. BY MR. AUCHINCLOSS: Do you think all child molest victims divulge, as children, that they've been molested?
MR. MESEREAU: Objection. Assumes facts not in evidence; beyond the scope; improper opinion.
THE COURT: Overruled.
You may answer.
Q. BY MR. AUCHINCLOSS: Do you think that?
A. Can you repeat the question, please?
Q. Do you think that all child molest victims divulge the fact that they've been molested when they are children? 9328

A. I honestly have no idea. I haven't studied up on all the requirements of a child molester.
Q. Do you have an impression of the type of shame that would be associated for a child to admit that he's been molested?
A. Again, I don't really know what goes through somebody's mind.
Q. There would be a great deal of guilt associated with a family, parents, that allowed their child to sleep with Michael Jackson or an adult, any adult, if they found out that that child had been molested by that person, wouldn't there?
A. I don't think there would necessarily be guilt. I think there would be anger and they would do whatever they could to have that person not around.
Q. It would upset them, though. It would be disturbing, wouldn't it?
A. Yes.
Q. That's a feeling they'd like to avoid, wouldn't it?
A. No, I think it's a feeling that they would want to solve.
Q. But if they chose to deny that feeling, you could understand why, couldn't you?
A. I don't know. I've never been put in that position.
MR. AUCHINCLOSS: I have no further 9329

1 questions.
2
3 REDIRECT EXAMINATION
4 BY MR. MESEREAU:
5 Q. Miss Robson, if you thought your brother had
6 been molested by Michael Jackson, would you go to a
7 lawyer first to seek money?
8 MR. AUCHINCLOSS: Objection. Requires
9 speculation; argument.
10 THE COURT: Sustained.
11 Q. BY MR. MESEREAU: The prosecutor asked you
12 questions about whether or not you believed your
13 brother Wade felt his friendship with Michael
14 Jackson was important. Do you remember that
15 question?
16 A. Yes, I do.
17 Q. And you said you thought so, right?
18 A. Yes.
19 Q. Why do you think so?
20 A. Because I think that anybody that gains a
21 friendship with anyone thinks that that relationship
22 is important, otherwise they would not be friends
23 with that person.
24 Q. And was it your belief that your brother had
25 a good friendship with Michael Jackson?
26 MR. AUCHINCLOSS: Objection; leading.
27 THE COURT: Overruled.
28 THE WITNESS: Yes. 9330

Q. BY MR. MESEREAU: Did you ever see a problem with that?
A. No.
Q. The prosecutor asked you about a special bond between Wade and Michael Jackson. Remember that question?
A. Yes.
Q. And did you think he had a special bond with Michael Jackson?
A. I think like any other friend.
Q. Do you think you have a special bond with Michael Jackson?
A. I do.
Q. Why?
A. Because he is my friend and I love him.
Q. Do you think Mr. Jackson has a special bond with your mom?
A. I do.
Q. Why do you think that?
A. Same reason. We're friends, and we're there for each other.
Q. Now, the prosecutor asked you about whether or not you were comfortable with the fact that children have slept in Mr. Jackson's room. Remember that?
A. Yes.
Q. Are you comfortable with that?
A. Yes. 9331

Q. Why?
A. Because I trust Michael Jackson.
Q. Why?
A. Because it's a feeling that I have. He's a friend, and he's never, ever made me feel like I shouldn't trust him.
Q. Now, the prosecutor asked you questions about the words "Apple Head" and "Doo-Doo Head," right?
A. Yes.
Q. Have you heard those words before?
A. Yes, I have.
Q. Let's start with "Apple Head." Where have you heard the word "Apple Head"?
A. Michael has called me and my brother "Apple Head."
Q. Where have you heard the word "Doo-Doo Head"?
A. Michael has called me or my brother "Doo-Doo Head."
Q. When Michael Jackson called you "Apple Head," did you ever get suspicious that some crime was occurring?
A. No.
Q. When Michael Jackson called you "Doo-Doo Head," were you ever suspicious that there was some sexual reason for that?
A. No. 9332

Q. When Michael Jackson called your brother
"Apple Head," did you ever suspect some abusive type
of thing was going on?
THE WITNESS: No.
MR. AUCHINCLOSS: Objection; leading.
MR. MESEREAU: I think he opened that, Your
Honor.
MR. AUCHINCLOSS: Same objection.
THE COURT: The answer was, "No." Next
question.
Q. BY MR. MESEREAU: When Mr. Jackson called
your brother "Doo-Doo Head," did you ever suspect
something nefarious was happening?
A. No.
Q. The prosecutor asked you questions about
victims of child molestation, okay? Did you ever
think your brother was the victim of a child
molestation?
A. I did not.
Q. Why not?
A. Because he would have told me.
Q. Did he ever tell you that he had been
improperly touched?
A. No, he did not.
Q. Did your brother ever tell you that he had
been molested?
A. No.
Q. In fact, did your brother ever tell you, "I 9333

1 have never been molested by Michael Jackson"?
2 MR. AUCHINCLOSS: Objection; hearsay.
3 THE COURT: Sustained.
4 Q. BY MR. MESEREAU: Isn't it true you don't
5 think for one second that Mr. Jackson ever abused
6 your brother?
7 A. That is true.
8 Q. You don't think for one second that Mr.
9 Jackson ever molested your brother, do you?
10 A. That is true.
11 Q. You don't think for one second Mr. Jackson
12 ever touched your brother in a sexual way, right?
13 MR. AUCHINCLOSS: Objection; leading.
14 THE COURT: Overruled.
15 You may answer.
16 THE WITNESS: I do not think for one second.
17 Q. BY MR. MESEREAU: Why not?
18 A. Because --
19 MR. AUCHINCLOSS: Objection; asked and
20 answered.
21 THE COURT: Sustained.
22 Q. BY MR. MESEREAU: Prosecutor Auchincloss
23 asked you questions about a family feeling guilty
24 for allowing molestation to occur.
25 Do you feel guilty about anything involving
26 your relationship with Michael Jackson?
27 A. I do not.
28 Q. Why not? 9334

A. I have no reason to feel guilty. It's a normal friendship.
Q. To your knowledge, does your brother feel guilty about anything involving his relationship with Michael Jackson?
MR. AUCHINCLOSS: Objection. Speculation; hearsay.
THE COURT: Sustained.
Q. BY MR. MESEREAU: Have you discussed with your brother the prosecutor's allegations that Michael Jackson improperly touched him?
A. Yes.
Q. Have you had many discussions with him?
A. A couple.
Q. Your brother's pretty upset with these allegations, isn't he?
MR. AUCHINCLOSS: Objection. Hearsay; leading.
THE COURT: Overruled.
THE WITNESS: Yes, he is.
Q. BY MR. MESEREAU: Why?
A. Because they're not true.
MR. AUCHINCLOSS: Objection; hearsay.
THE COURT: Sustained.
Q. BY MR. MESEREAU: Are you upset with these allegations?
A. I am.
Q. Why? 9335

A. Because they're not true. And a friend of mine is being accused of something that's not true.
Q. Have you ever felt guilty about having a friendship with Michael Jackson?
A. I have not.
MR. AUCHINCLOSS: Objection; asked and answered.
THE COURT: The answer is in. Next question.
Q. BY MR. MESEREAU: Do you feel guilty about ever staying in Michael's room?
A. I don't.
Q. Do you feel guilty about ever visiting Michael's room?
A. I do not.
MR. AUCHINCLOSS: Objection; leading.
THE COURT: Overruled. The answer was given.
Q. BY MR. MESEREAU: Did you ever get the feeling Michael Jackson was trying to talk you into being in his room?
A. Never.
Q. Did you ever get the feeling Michael Jackson was trying to talk your brother into being in his room?
A. Never.
MR. AUCHINCLOSS: Objection; leading.
MR. MESEREAU: No further questions.
THE COURT: Overruled. 9336

RECROSS-EXAMINATION
BY MR. AUCHINCLOSS:
Q. You said that you trusted Michael Jackson?
A. Yes.
Q. Would you trust him never to give alcohol to a child?
A. Yes.
Q. Would you trust him never to show pornography -- well, excuse me, erotic -- adult erotic materials to a child?
A. Yes.
Q. Would you trust him not to keep those things laying around his bedroom when he has children in that room?
MR. MESEREAU: Objection. Assumes facts not in evidence; improper question.
MR. AUCHINCLOSS: There's evidence that he had --
THE COURT: Overruled.
You may answer.
THE WITNESS: Can you please repeat your question?
Q. BY MR. AUCHINCLOSS: Would you trust him not to have adult erotic materials sitting around his room when he had children in his room?
A. I don't know if that's a trust issue.
Q. Well, would you like him -- would you trust him enough to think that he'd keep those materials 9337

separate from children?
A. It would be nice. But I also understand it's somebody's house and sometimes things are lying around.
Q. Would you trust him enough to -- would you trust him not to have statues, figurines of nude women in bondage attire sitting around on a desk where he has his own children visiting him?
A. I don't know if he's ever had that, so --
Q. I'm asking you, would you trust him not to do that?
A. Yes.
Q. So if he did any of these things, he would be violating your trust, wouldn't he? You'd have to evaluate your level of trust, wouldn't you?
A. No, I don't think it would violate my trust.
Q. If he showed -- if he showed erotic -- adult erotic materials to a child that he's been giving alcohol to, wouldn't you have to reevaluate whether you trust this man or not?
MR. MESEREAU: Objection; argumentative.
THE COURT: Overruled.
You may answer.
THE WITNESS: Repeat the question, please.
Q. BY MR. AUCHINCLOSS: My question is, if Mr. Jackson showed adult erotic material to a child that he'd been giving alcohol to, you'd have to reevaluate whether you really trust this man or not, 9338

wouldn’t you?
A. If Michael Jackson did do that, yes, you would have to reevaluate.
Q. So you wouldn’t trust him if he did that?
A. If he did that, yes. But I don’t believe he did it, so....
MR. AUCHINCLOSS: I have no further questions.

FURTHER REDIRECT EXAMINATION
BY MR. MESEREAU:
Q. You’ve heard about the allegations in this case, right?
A. Yes.
Q. You’ve discussed them with your family, right?
A. Yes.
Q. You don’t believe Michael Jackson ever molested the Arvizo children, do you?
A. I --
MR. AUCHINCLOSS: Objection. That calls for a conclusion; impermissible question.
THE COURT: Sustained.
Q. BY MR. MESEREAU: Do you trust that Michael Jackson never molested any alleged victim in this case?
MR. AUCHINCLOSS: Same objection.
MR. MESEREAU: He raised the issue of trust, 9339

1 Your Honor.
2 MR. AUCHINCLOSS: It is -- well --
3 THE COURT: Sustained.
4 Q. BY MR. MESEREAU: Do you trust Michael
5 Jackson?
6 A. I do.
7 Q. Why do you trust Michael Jackson?
8 A. Because he is my friend.
9 MR. AUCHINCLOSS: Objection. Asked and
10 answered; beyond the scope.
11 THE COURT: Overruled.
12 You can complete your answer if you didn't.
13 MR. MESEREAU: Let me withdraw the question.
14 THE COURT: She answered it.
15 MR. MESEREAU: Okay.
16 THE COURT: But I'm not sure she wasn't cut
17 off in the middle.
18 THE WITNESS: That's okay.
19 He's my friend.
20 Q. BY MR. MESEREAU: Are there any other
21 reasons why you trust Michael Jackson?
22 A. He has never, ever given me any reason not
23 to trust him.
24 Q. Do you think he's honest?
25 A. I do.
26 Q. Do you think he's a sensitive man?
27 A. I do.
28 Q. Do you think Mr. Jackson would ever, ever 9340

harm a child?
A. I don't, no.
MR. AUCHINCLOSS: Objection; leading.
THE COURT: Sustained.
Q. BY MR. MESEREAU: Do you trust --
THE COURT: Wait a minute.
I'll strike the answer.
Q. BY MR. MESEREAU: Do you trust that Mr.
Jackson would --
MR. AUCHINCLOSS: Your Honor, I'm going to
object. I'm going --
MR. MESEREAU: Your Honor, the prosecutor
asked her all these questions about her trust in Mr.
Jackson. I'm just --
THE COURT: That's correct.
MR. MESEREAU: I'm just examining on those
issues.
THE COURT: You may on some issues. And some
you may not.
MR. MESEREAU: Okay.
THE COURT: So take it one question at a
time.
Q. BY MR. MESEREAU: Do you trust that Mr.
Jackson would never give alcohol to a cancer patient
so he could commit the crime of molestation?
A. I do.
MR. AUCHINCLOSS: Objection; leading. Also
calls for an ultimate issue, ultimate conclusion. 9341

THE COURT: I'll sustain the objection.
Q. BY MR. MESEREAU: Please tell the jury every reason why you trust Michael Jackson.
MR. AUCHINCLOSS: Objection; asked and answered.
THE COURT: Overruled.
You may answer that.
THE WITNESS: He has been my friend for many years. He has cared for me like an older brother and a father. There has never been one time in my life where he has ever turned his back on my family. Vice versa. My family has never turned our back on him. We love him.
It's hard to explain. When you have a friendship with someone and you know that it's a true person and it's a friend --
MR. AUCHINCLOSS: I'm going to object as a narrative.
THE COURT: Overruled.
Were you through with your statement?
THE WITNESS: It's just that he's a true person and he's a friend, and I trust him always.
MR. MESEREAU: No further questions.

FURTHER RECROSS-EXAMINATION
BY MR. AUCHINCLOSS:
Q. Just one last question.
In your eyes, Mr. Jackson can do no wrong, 9342

can he?
A. That is not true.
MR. AUCHINCLOSS: I have nothing further.
MR. MESEREAU: No further questions.
THE COURT: All right. You may step down.
THE WITNESS: Thank you.
THE COURT: Call your next witness.
MR. MESEREAU: Yes. The defense will call
Lisbeth Barnes.
THE COURT: When you get to the witness
stand, please remain standing.
Face the clerk right here, and raise your
right hand.

MARIE LISBETH BARNES
Having been sworn, testified as follows:

THE WITNESS: I do.
THE CLERK: Please be seated. State and
spell your name for the record.
THE WITNESS: Do you --
Marie, M-a-r-i-e; Lisbeth, L-i-s-b-e-t-h;
Barnes, B-a-r-n-e-s.
THE CLERK: Thank you.

DIRECT EXAMINATION
BY MR. MESEREAU:
Q. Good morning, Miss Barnes. 9343

A. Good morning.
Q. Where is your home?
A. In Melbourne, Australia.
Q. And you have a son, right?
A. Yes, I do. And a daughter.
Q. And what is your son's name?
A. Brett.
Q. And your daughter's name?
A. Karlee.
Q. Okay. Do you know the person seated at
counsel table to my right?
A. I do.
Q. And who is he?
A. Michael Jackson.
Q. When did you first meet him?
A. 19 -- December 1991.
Q. And how did you meet him?
A. Well, actually, when I met him personally
was in December of 1991, but I had spoken to him for
several years prior to that. I -- he invited us to
his home in December 1991, and that's when I met him
for the first time.
Q. Okay. Now, you said you'd been speaking to
him for a while before that?
A. Since 1987.
Q. And why were you speaking to him?
A. Because he had called -- my son had written
a letter to him when he was very young, when Michael 9344

was touring Australia. And he received the letter and he -- well, he pulled out a letter out of the bag, that's what he told me, and it was Brett's, and he decided that he'd call him to thank him for the letter. And he spoke to all of us, and we developed a friendship, and he continued calling us and speaking to us.
And then one day he decided to invite us over to his home, and since then we've been regular visitors.
Q. Do you still consider Mr. Jackson to be your friend?
A. Oh, definitely.
Q. Where are you staying at the moment?
A. I'm staying at his -- at Neverland Valley, at his place.
Q. How many times do you think you have stayed over at Neverland?
A. Several times. I can't count.
Q. Can you give an estimate?
A. No.
Q. Would it be ten times?
A. Could be. Yeah.
Q. Could it be 20?
A. No, maybe not 20. Probably about ten, I guess, or a little bit more, a little bit less. I'm not sure. I'm -- I know it's several times. I can take time and count back, but I haven't thought 9345

about it.
Q. Okay. And your first visit to Neverland was when, what year, if you know?
A. December 1991.
Q. Okay. And who did you visit Neverland with?
A. Our family. My husband, my two children.
Q. Okay. And how long did you stay there?
A. About three weeks. Well, we stayed with Michael for that three weeks. He took us to Disneyland, to Las Vegas, and, yes, we were together for three weeks.
Q. Okay. And where did you stay during those three weeks?
A. Sometimes at Neverland Valley. Sometimes at Disneyland, and Las Vegas, depending on the places we were visiting. And sometimes at the hotel in Los Angeles.
Q. Okay. Now, let me direct you to the first time -- first night you were at Neverland, okay?
A. Uh-huh.
Q. What did you do?
A. We -- he took us on a tour of the place, and we -- pretty much that. And then we watched a film at the theater, had dinner, sat down and talked, and pretty much that.
Q. Where did you stay that evening?
A. In one of the guesthouse -- guest units at the ranch. 9346

Q. And do you know where your children stayed that evening?
A. Same -- well, one of the other units at the -- they're just a group of units, and they were in the next one.
Q. To your knowledge, has your son ever stayed in Michael Jackson's room at Neverland?
A. Yes, he has.
Q. And when was the first time that happened?
A. I couldn't tell you. I couldn't remember. I can't remember. I'm sorry.
Q. To your knowledge, has your daughter ever been in Michael Jackson's room?
A. Yes, she has also.
Q. And to your knowledge, has she ever stayed in his room?
A. Yes, she has.
Q. And how about you, have you ever been in his room?
A. Yes, I have. And I have been invited to stay over because we were watching videos and talking, and he just suggested, "Well, why don't you stay; stay here," because it was raining outside. And he said, "Well, you can stay here." And I stayed for a little while, but then I went back to my room. It was just more comfortable.
Q. How many times do you think you've been in Michael Jackson's room at Neverland? 9347

A. Oh, several times.
Q. Has it been all times of day?
A. Yes. I had pretty much free rein -- just anytime I wanted to, I was allowed to.
Q. Now, let me ask you about that. You've been in Michael Jackson's room during the day, right?
A. Uh-huh.
Q. You've been there during the evening, right?
A. Yes.
Q. Have you been there late into the night?
A. Well, yes. Pretty much when we were watching videos, it would be -- go pretty well late into the night.
Q. How often do you think you've watched videos late into the night in Michael Jackson's room?
A. Several times.
Q. Okay.
A. Or times we were just talking, or --
Q. When you visited Neverland with your children, did you feel that you had free access to Michael Jackson's room?
A. Yes.
Q. And why did you feel that way?
A. Well, he gave me free access. He -- he -- I remember a particular occasion when I wanted to borrow some CDs, and he said, "Just come into my room and" -- that is where they are kept and he showed me where the selection of CDs were kept, and 9348

he said, “Anytime you want to come and borrow the CDs, feel free to do so.”
Q. And how would you describe Mr. Jackson’s room?
A. Just a huge room and -- with lots of things in it. Very, very warm and -- but nothing ostentatious. I don’t know what sort of description you’re looking for.
Q. Is it two levels? Do you recall an upstairs and a downstairs in the room?
A. Uh-huh.
Q. Have you been into both parts of his room?
A. Uh-huh. Yes.
Q. Do you recall having to knock on a door to get into his room?
A. Well, I do that normally when I go into -- doesn’t matter whose place I go, it’s just common courtesy to knock before you enter. But I could have just -- the door was never locked, so I could go in anytime I wanted to.
Q. Were you ever denied access to his room?
A. Never.
Q. Did you ever go into the room when your children were in the room with him?
A. Yeah.
Q. Have you done that often?
A. Yeah.
Q. Now, what have you seen your children doing 9349

with Mr. Jackson in Mr. Jackson's room?
A. Just talking, watching films, and listening to -- just reading stories or just having fun. Just chilling out, you know. Playing with games, toys, whatever.
Q. Have you ever seen Mr. Jackson do anything inappropriate with either of your children?
A. No. Never.
Q. Ever seen Mr. Jackson inappropriately touch your son?
A. Never.
Q. Ever seen Mr. Jackson inappropriately touch your daughter?
A. Never.
Q. Have you ever seen Mr. Jackson hug your son?
A. Yes.
Q. Have you ever been suspicious of the fact that Mr. Jackson hugged your son?
A. No.
Q. Have you ever seen Mr. Jackson hug your daughter?
A. Yes.
Q. Have you ever been suspicious of Mr. Jackson hugging your daughter?
A. No.
Q. Have you ever seen Mr. Jackson kiss your son on the cheek?
A. Yes. 9350

Q. Has that ever made you suspicious of Mr. Jackson?
A. No.
Q. Ever seen Mr. Jackson kiss your daughter on her cheek?
A. Yes.
Q. Have you ever been suspicious of that behavior?
A. No.
Q. Okay. Now, you gave your son permission to stay in Mr. Jackson's room, correct?
A. Yes, correct.
Q. Did you give your daughter permission to stay in his room?
A. Correct.
Q. Why?
A. Why not?
Q. Did you trust Mr. Jackson?
A. Implicitly. I always trusted him and I still trust him.
Q. Why?
A. Because he's just a very nice person. And you just feel when you can trust someone and when you can't trust someone. And I had total trust in him.
Q. And your son traveled with him at some point, correct?
A. Uh-huh. Correct. 9351

Q. When was that?
A. It would have been January 1992, I think.
Q. Did you allow your son --
A. January, February.
Q. Did you allow your son to travel with Mr. Jackson?
A. I allowed him, yes.
Q. Why was that?
A. Because, to me, it was a learning experience, and -- visiting other countries, and I couldn't -- you know, I was -- it didn't bother me at all.
Q. Did you ever suspect that Mr. Jackson had inappropriately touched your son?
A. Never.
Q. Have you discussed with your son allegations that Mr. Jackson inappropriately touched him?
A. Well, there were allegations, and we had talked about it, and I have asked him. I said, "Look me in the eyes and tell me that nothing has happened to you, that Michael has never done anything inappropriate to you."
And he said he --
MR. ZONEN: I'm going to object to the response as hearsay, Your Honor.
THE COURT: Sustained.
MR. ZONEN: Move to strike the answer.
THE COURT: Stricken. 9352

Q. BY MR. MESEREAU: As you sit here today,
do you think Mr. Jackson has ever inappropriately
touched your son?
MR. ZONEN: I believe that's character
opinion. I'll object, unless this witness is a
character witness.
THE COURT: Sustained.
MR. MESEREAU: No further questions.

CROSS-EXAMINATION
BY MR. ZONEN:
Q. Miss Barnes, good morning.
A. Good morning.
Q. Your child Brett was how old when he first
met Michael Jackson?
A. Nine.
Q. And was that on the occasion of your first
visit?
A. Going on ten. Yes.
Q. He was nine years old?
A. He may have been ten.
Q. And your daughter was how old?
A. 12.
Q. And your daughter's name is what?
A. Karlee.
Q. Karlee? Am I doing that right? Karlee?
A. Uh-huh. K-a-r-l-e-e.
Q. And both of them stayed with Michael Jackson 9353

1 that first night that you were at Neverland?
2 A. Well, we all stayed together and they --
3 like I said, they slept in the -- in one of the
4 guest units, and we slept in the other guest unit.
5 Q. They slept in one of the guest units. Who
6 are “they”?
7 A. My children. Brett and Karlee.
8 Q. All right. They both stayed in one of the
9 guest units?
10 A. That’s correct.
11 Q. And you stayed in a separate guest unit?
12 A. That’s correct.
13 Q. And Mr. Jackson stayed in his residence?
14 A. That’s correct.
15 Q. All right. And the guest unit, of course,
16 is an entirely different structure than his
17 residence; is that right?
18 A. Uh-huh.
19 Q. You would have to walk outside and some
20 distance before you would get to his house?
21 A. That’s correct.
22 Q. Did you continue to stay in the guest unit
23 while you were there?
24 A. Yes.
25 Q. And for what period of time did you stay at
26 Neverland before you finally returned to Australia?
27 A. Well, we were -- we were at Neverland on --
28 on and off for over a three-week period, but we 9354

didn’t stay at Neverland the whole time.
Q. How long did you stay at Neverland?
A. Well, it was a few days in Neverland and a few days outside of Neverland, coming back, so altogether -- I couldn’t tell you exactly how many days altogether.
Q. Was your husband there as well?
A. Yes, he was.
Q. And other members of your family?
A. Well, my son and my daughter, and that’s the complete family.
Q. Okay. You didn’t have any aunts or grandparents or cousins or anything like that?
A. No.
Q. So it was the four of you; is that correct?
A. That’s correct.
Q. And you wandered between Neverland and other locations in California; is that right?
A. And Las Vegas.
Q. And Las Vegas.
Did you travel with Mr. Jackson during that time?
A. Yes.
Q. So he took you to different locations; is that right?
A. That’s correct.
Q. At what stage did your son begin to stay in his room or with him in a hotel room, together? 9355

A. I don’t remember.
Q. Well, the first time you’re telling us --
A. It’s not the first few nights. It could be -- I’m not really sure exactly when.
Q. By about the third night?
A. Could be. It could be a little bit later.
Q. Fourth night?
A. I don’t remember.
Q. This is a trip that went about three weeks; is that right?
A. That’s correct.
Q. The trip was paid for entirely by Mr. Jackson?
A. That’s correct.
Q. And that included all of the transportation for you, your husband and your two children from Australia to California and back; is that right?
A. That’s correct.
Q. As well as all of your housing accommodations, travel needs and entertainment; is that right?
A. That’s correct.
Q. Did he purchase gifts for the four of you while he was there?
A. Yes, he did.
Q. And by the fourth night, your son was sleeping in his room; is that correct?
A. No, I didn’t say by the fourth night he was 9356

sleeping in his room.
Q. What night was it, then?
A. I'm not sure what night it was.
Q. Was it within the first week?
A. It could have been. It may have been. It may not have been. I don't remember.
Q. But he was sleeping with your son in the same bed before this trip was over; is that correct?
A. That's correct.
Q. All right. Was he sleeping in the same bed with your son for an extended period of time?
A. On -- no, not -- not continuously, no. Just on-and-off basis when they were -- the times when my son would fall asleep when we were there, and he stayed there and -- rather than having to go back to -- outside into the unit.
MR. ZONEN: Your Honor?
THE COURT: Thank you. We'll take our break.
(Recess taken.)
THE COURT: You may proceed.
MR. ZONEN: Thank you, Your Honor.
Q. Miss Barnes, we were on a -- the initial visit, your initial visit to California to Neverland, and I believe you were telling us --
BAILIFF CORTEZ: Your microphone's off.
Q. BY MR. ZONEN: We were discussing your initial visit to California and to Neverland, and I believe that you said it was when your son was about 9357

nine years old. How much older was your daughter?
A. I said ten, actually. Nearly ten.
Q. I'm sorry, ten years old he was?
A. Well, he was going to be ten in January, so it was December, so he was nearly --
Q. Close to his tenth birthday?
A. Uh-huh.
Q. And your daughter was how old at the time?
A. 12.
Q. And you took trips with the defendant to a number of different locations, including Las Vegas?
A. That's correct.
Q. What other cities did you go to besides Las Vegas?
A. Well, Los Angeles. We went to Disneyland. This is Anaheim, I believe --
Q. Okay. Where else?
A. -- on that trip. That's about it, I think.
Q. All right. Would it be fair to say that most of the time that you were there, you were at Neverland; is that correct?
A. Not quite. Not really, no, because we spent a few days in Las Vegas. We spent a few days at Disneyland. And when we were in Disneyland, I know we went to Century City, so I'd say -- I wouldn't say most of the time, no.
Q. Well, a few days in Century City? 9358

A. A hotel there. There's a hotel in Century City.
Q. Was that across the street from his condominium?
A. That's correct.
Q. When you were at the hotel in Century City, was your son staying with Mr. Jackson in his condominium?
A. No, he stayed with us.
Q. He stayed with you for the entire time?
A. I believe so.
Q. When you were at the Las Vegas hotel, did your son stay with Mr. Jackson?
A. We were all together.
Q. In Mr. Jackson's room?
A. Well, we shared a villa, so there were several rooms in the villa. It's like a --
Q. And in which room did your son sleep?
A. With my daughter.
Q. Your son slept with your daughter?
A. Yes.
Q. So he didn't stay with Mr. Jackson at any time while you were in Las Vegas?
A. I don't recall. I don't remember.
Q. He didn't stay with Mr. Jackson at any time when you were in Century City?
A. He may have. I'm not sure. No, I'm not -- I cannot tell you, because I don't remember. 9359

Q. Did you stay at a hotel when you were at Disneyland?
A. We were at The Disneyland Hotel.
Q. For how long? More than one night?
A. Yes.
Q. Two nights?
A. Probably four, five nights, I would say.
Q. Four or five nights?
A. Uh-huh.
Q. At Disneyland Hotel?
A. Uh-huh.
Q. And did your son stay with Mr. Jackson while --
A. We were all, again, in the same --
Q. Suite?
A. Yes.
Q. Did your son stay in Mr. Jackson's room in that suite while you were at The Disneyland Hotel?
A. I don't remember. Possibly. I don't remember.
Q. You're not certain?
A. No.
Q. All right. Now, the first time that your son ended up staying in Mr. Jackson's room, had you had a conversation with Mr. Jackson prior to that event? Did Mr. Jackson talk with you about your son staying with him in his room?
A. No. It was my son's decision to stay the 9360

night.
Q. It was your son's decision to stay?
A. Uh-huh.
Q. Well, explain how that happened.
A. He wanted --
Q. Your son came to you and asked you if he could stay with Mr. Jackson?
A. No, we just happened to be in the room, and he said he wanted to stay. He wanted to stay there for the night, because they were having fun, and he -- he just said he was going to stay there and --
Q. Was this is at Neverland we're talking about?
A. That's correct.
Q. It's not at one of the hotels?
A. No.
Q. It's before you began your series of trips around different places; is that correct?
A. That's correct. Uh-huh.
Q. So it was in the early part of your stay in California?
A. Yes, I would say so.
Q. And your son came to you -- and your son came to you and said that he would like to spend the night --
A. He didn't come to me. Well, I was there with him.
Q. And your daughter was there as well? 9361

A. Uh-huh.
Q. You were all on the bed together?
A. Well, we were in the room together.
Q. Which room is that? The downstairs room?
A. That's correct.
Q. And there is a bed in the downstairs room?
A. That's correct.
Q. And there's a bed in the upstairs room?
A. That's correct.
Q. Were you watching T.V.?
A. We were at the time. I don't remember what we were doing. I'm sorry.
Q. Was your husband there as well?
A. I don't remember.
Q. Was your daughter there as well?
A. I presume so.
Q. Do you know at what hour it was that your son --
A. No, I don't remember.
Q. -- that your son expressed the desire to remain in Mr. Jackson's room?
A. I don't remember.
Q. Was it late at night?
A. I don't remember. I'm sorry.
Q. Was it potentially very early in the morning?
A. I don't -- I don't remember. I'm sorry. I just don't remember. It was just a long time ago. 9362

Q. Did you understand him to mean that he was going to be sleeping in Mr. Jackson's bed?
A. I would imagine so, because eventually he would have fallen asleep.
Q. Is that where he was at the time that you left the room?
A. What do you mean?
Q. At the time that your son said he wanted to stay there, was Mr. Jackson there?
A. Yes, he was.
Q. Was Mr. Jackson on the bed?
A. No. He was just in the room, sitting on one of the chairs, walking around. He likes walking around.
Q. He walks around?
A. Uh-huh.
Q. So he was walking around, and your son was on the bed?
A. I'm not really sure whether he was on the bed or whether he was playing with something on the floor, or --
Q. Do you remember the conversation where he asked you -- your son asked you to remain in Mr. Jackson's room? Do you remember that conversation?
A. No, I don't.
Q. But you do remember -- but you do remember that it was your son who asked if he could stay there? 9363

A. It was his decision, yes.
Q. Was Mr. Jackson party to that conversation?
A. No. Well, he was there. But he wasn't party to -- he wasn't actually taking part in the conversation, if that's what you mean.
Q. Did you say to your son, "No, that's not appropriate. Come back to the guest cottage with your family"?
A. No, I didn't.
Q. You said it was all right for him to stay in that room?
A. Yes.
Q. Did Mr. Jackson say to you, "It's okay with me, he can stay here"? Did he say that to you?
A. Well, I don't remember what he said at the time. I just asked him if it was okay. And --
Q. Who asked who if it was okay?
A. I asked Mr. Jackson if it was okay, and he said, "Yes. If he wants to stay, that's fine."
Q. So you did have a conversation with Mr. Jackson about your son remaining?
A. Well, I can't say that it's a conversation. If I just asked him something, it's not really a conversation as far as I'm concerned, I'm sorry.
Q. Now, your son at the time was almost ten years old?
A. That's correct.
Q. And Mr. Jackson at the time was in his 9364

mid-30s?
A. Yes.
Q. Had your son slept with any other man in his mid-30s up to that point other than a relative?
A. Well, he slept with my brother at my parents' place.
Q. Do you understand your brother to be a relative?
MR. MESEREAU: Objection. The prosecutor is not letting her complete her answer.
THE COURT: The objection is overruled. You may answer the last question. Do you want it read back?
THE WITNESS: I'm sorry, I didn't quite hear.
THE COURT: I'll have the court reporter read it to you.
(Record read.)
THE WITNESS: Yes.
Q. BY MR. ZONEN: All right. Do you understand that the question I asked was other than relatives? Had your son, at that point in his life, slept with any other men other than relatives; adult, grown men?
A. No.
Q. All right. Since that date, has he slept with any adult, grown men during the balance of his adolescence other than a relative? 9365

A. Not that I know.
Q. All right. Now, Miss Barnes, at the time that he first spent the night in Mr. Jackson's room, in Mr. Jackson's bed, you had known Mr. Jackson what, a couple days?
A. Well, I had met him a couple of days, but I had known him -- I had been friends with him -- I consider myself being friends with him, because we had communicated over the phone for several years prior to that.
Q. You'd had telephone conversations --
A. Uh-huh.
Q. -- with him.
The first time that you actually spent any time in his home with him was the occasion of this first visit just prior to your son's --
A. That's correct.
Q. -- tenth birthday.
All right. Did your son continue to sleep with him thereafter?
A. Not every day.
Q. But many days?
A. On occasions.
Q. And your son visited Mr. Jackson on a regular basis over the years for the balance of his adolescence, did he not?
A. And we did as a -- we did as -- my daughter, myself and my son. We did. 9366

Q. Yes.
A. And my husband was present on occasions, but he had to work on other occasions.
Q. Yes. And other occasions your son came by himself?
A. And other occasions, yes, he did come by himself.
Q. Some occasions he went with you?
A. That's correct.
Q. On some occasions he traveled with Mr. Jackson extensively, did he not?
A. I would say so.
Q. He traveled rather extensively with Mr. Jackson throughout the United States, didn't he?
A. I believe so.
Q. Do you know how many cities he traveled with your son, he traveled to with your son?
A. I couldn't tell you how many cities, no.
Q. Were you present when he traveled through the United States with your son?
A. To some places I was present, yes.
Q. Which places were you present?
A. Chicago, Las Vegas. I'm not really sure. There were several occasions where I was present.
Q. Several occasions beyond Chicago and Las Vegas?
A. Well, not several cities, but several occasions where -- 9367

Q. Were you with your son on all of the occasions when he traveled with Mr. Jackson throughout the United States?
A. Not all. Not all the occasions, no.
Q. Were there occasions when you stayed back in Australia?
A. Yes, there were occasions when I stayed back.
Q. And your husband stayed back in Australia as well?
A. That's correct.
Q. For what periods of time would your son be in California or traveling in the United States with Mr. Jackson without you being there?
A. I don't recall.
Q. And you have no idea what cities they went to?
A. Well, I have an idea of some of the cities they went to.
Q. All right. You just said Las Vegas and Chicago. Do you remember any of the others?
A. I know that he's been to New York with Mr. Jackson.
Q. He went to New York. Okay. Where else?
A. Chicago.
Q. And Chicago?
A. I don't really recall any other cities in the United States. 9368

MR. ZONEN: May I approach the witness?
THE COURT: You may.
MR. MESEREAU: May I see?
MR. ZONEN: Same ones we did yesterday.
MR. MESEREAU: Oh, okay.
Q. BY MR. ZONEN: I'd like to show you a series of photographs, if I may, and please tell me if you recognize these photographs. Number 889 I'll begin with; two photographs in the front, two photographs in the back.
Go ahead and look at the back side as well.
A. Uh-huh.
Q. Who's the subject of those photographs?
A. My son.
Q. Brett?
A. That's correct.
Q. And approximately how old was he when those pictures were taken?
A. Like I said, probably about ten, I guess. 10, 11.
Q. Do you have a recollection of those pictures being taken?
A. These ones, definitely, because he was just playing games. And him and my daughter were playing games in the photo box, and they were just pulling faces.
Q. This is a photo box at Neverland?
A. That's correct. 9369

Q. All right. And the two photographs you're talking about are the two on the back side of 889; is that correct?
A. That's correct.
Q. How about the two photographs on the front side of 889, do you recognize those?
A. No, I don't recognize anyone's face in those.
Q. Do you recognize the setting?
A. I believe I do, yes.
Q. And where is that?
A. Or do I? No, I'm not really sure actually.
Q. That's fine. Take a look at Exhibit 890, two photographs in the front. Do you recognize the two photographs?
A. No, I don't.
Q. Do you recognize the people in either of the two photographs?
A. I do.
Q. Who are they?
A. The top photo is Mr. Jackson, and -- I believe so. And -- I need my glasses for that one. And the bottom one is my son.
Q. All right. Number 891, do you recognize the subject matter of those two photographs?
A. I believe they're Mr. Jackson.
Q. Okay. Are you familiar with the setting of those photographs? Were you there when they were

taken?
A. No.
Q. You don’t have a recollection of these photographs being taken; is that correct?
A. No.
Q. The three photographs on the back of 891, do you recognize those?
A. I believe them to be Mr. Jackson.
Q. Number 892, two photographs in the front.
A. Uh-huh.
Q. Who are they?
A. The top one of my son Brett, and the bottom one of my son with Mr. Jackson.
Q. How old do you believe Brett is in those photographs?
A. About 12, I would say. Probably 12, 13. Probably 12, I’d say.
Q. He had long hair that he wore at the time?
A. Uh-huh.
Q. Did he wear long hair for a number of years like that?
A. He did. And then he had -- he had a haircut in 1993, and then he grew it again.
Q. On the back side of Exhibit No. 892, who is that?
A. Again, my son with Mr. Jackson.
Q. Number 893?
A. Same. 9371

1 Q. Again, your son and Mr. Jackson, both
2 photographs?
3 A. Uh-huh.
4 Q. And the photograph on the back, the top
5 one --
6 A. Uh-huh.
7 Q. -- is your son?
8 A. That's correct.
9 Q. Okay. And the bottom one as well?
10 A. The bottom one is my son.
11 Q. Number 894, four photographs?
12 A. Uh-huh. Mr. Jackson.
13 Q. And the two on the back?
14 A. Again, Mr. Jackson.
15 Q. And 895, we have two photographs in the
16 front and four on the back.
17 A. Uh-huh. My son.
18 Q. Okay. Now, 896, we have two photographs in
19 the front and two on the back. Take a look at these
20 and tell me if you recognize them.
21 A. No, I don't believe I know the location.
22 Q. The two photographs on the back and the one
23 photograph on the front on the bottom are of
24 buildings and a skyline; is that right?
25 A. Yes.
26 Q. Okay. And you don't remember that setting
27 at all? That's not familiar to you?
28 A. No. 9372

Q. Okay. Did you travel to Chicago with your son and Mr. Jackson?
A. I did on one occasion, with -- when he was filming the video for the song “Jam” with -- with Mr. Michael Jordan in that video. Yes, that was the occasion I traveled with --
Q. Where did your son stay in Chicago during that trip?
A. He stayed with -- with me at times and --
Q. With Mr. Jackson?
A. -- with Mr. Jackson at times, yes.
Q. Yeah. How long did that tour go on? Was he actually on a tour?
A. No, that was just a few days that we went to Chicago, and then we had to come back. We had to go back again.
Q. Do you remember how old your son was at that time?
A. About 11.
Q. Between the ages of ten and --
A. Ten.
Q. -- and 13, how often did your son travel to Neverland?
A. Several times.
Q. “Several times” meaning what?
A. I don’t remember.
Q. More than once a year?
A. I would say probably, yes. 9373

Q. More than twice a year?
A. Probably, on average, about two, three times.
Q. Two or three times a year. On how many of those occasions did you accompany him to Neverland between the ages of 10 and 13?
A. Most of the time I did.
Q. Now, your son traveled with him extensively in South America, did he not?
A. No, we were present, my family. My husband, my daughter and I were present when we toured South America.
Q. All right. And how long of a tour was that?
A. I don't quite remember. Couple months maybe. I'm not sure. I don't remember.
Q. Did you travel for the entirety of that tour?
A. Yes, I did.
Q. So for a couple months you traveled throughout South America?
A. Uh-huh.
Q. And your son was there as well the entire time?
A. That's correct. And my daughter and my husband.
Q. Your daughter and your husband and you for the entire time?
A. Yes. 9374

Q. That was a couple months?
A. I would say probably -- it could be -- could have been three months. I don't remember.
Q. Three months?
A. Could have been.
Q. Your husband was able to take three months off from work?
A. Yes, because he had long service leaves.
Q. He had what?
A. Long -- in Australia, after you work for, say, ten years, you're entitled to long service leave, so you have three months every ten years. And he had two lots of long-service leave that he was able to take.
Q. And that trip was paid for entirely by Mr. Jackson, was it not?
A. That's correct.
Q. And is it true that during the entirety of that trip your son slept in Mr. Jackson's room with Mr. Jackson?
A. I wouldn't say during the entirety.
Q. Most of it?
A. I would say at times.
Q. At times?
A. Uh-huh.
Q. What does that mean? Once a week?
A. Well, I can't give you an exact number of times, because it happened quite a while. 9375

Q. Your son was how old at that point, the time of the South America trip?
A. 12, I would say.
Q. I'm sorry?
A. 12. I --
Q. 12? 12 years old?
Did your husband ever express any concerns to you about your son sleeping in the same bed with Mr. Jackson?
A. No.
Q. Did you ever discuss it with him at all?
A. Yes. We talked -- well, we didn't see any -- any reason -- we talked about it. It wasn't a discussion, as such, that -- because I couldn't make a decision and say, "Well, yes, it's okay," and not consult my husband, because he's part of the family. So....
Q. So at some point in time there was a discussion that you had with your husband about your son sleeping with Michael Jackson?
A. A conversation that we decided whether we should -- whether it was okay, because we didn't want to impose on Mr. Jackson.
Q. Was this the sole issue that you were dealing with was whether or not your son sleeping with him was an imposition for Mr. Jackson? That was the sole concern you had?
A. Yes. 9376

Q. How many conversations did you have with your husband about the question of where your son slept?
A. I don't remember.
Q. More than ten?
A. No. I don't remember.
Q. Do you remember at what age your child was at the time of that discussion?
A. No. I don't remember.
Q. He could have been ten?
A. I don't remember. I'm sorry.
Q. Could have been 13?
A. I don't remember.
Q. Do you know if he had already been sleeping with Mr. Jackson for a period of three or four years by the time you had this conversation with your husband?
A. I don't think so.
Q. Well --
A. I think it would have been before, before that.
Q. Perhaps a year?
A. No. It would have been at the beginning, I guess.
Q. So your son was closer to age ten, or perhaps age ten at the time this happened?
A. That's correct. Yes.
Q. All right. And then your discussion with 9377

your husband took place where? Was it in Australia
or was it in the United States?
A. While we were here.
Q. So “here” being what? Neverland,
California?
A. Yes.
Q. So early on, then. Was it perhaps the first
visit that you had taken to Neverland?
A. I’m sorry?
Q. Was it perhaps the first visit that you had
taken to Neverland?
A. What’s the question?
Q. The question of when you had the
conversation with Mr. -- with your husband about
your son sleeping with Michael Jackson.
A. I would say that would have been perhaps at
the -- during the first visit, yes.
Q. During the first visit?
A. Uh-huh.
Q. And the only subject of that conversation
with your husband was whether or not it
inconvenienced Mr. Jackson to have your son in bed
with him; is that true?
A. I believe so.
Q. Did Mr. Jackson ever tell you that he
thought of you as family?
A. Yes.
Q. Did he do that often? 9378

A. I believe so, yes.
Q. Did he encourage you to think of him as family?
A. Yes.
Q. And did he, in fact, suggest that you consider that he be family to you?
A. I believe so.
Q. Did he tell you that he was going to be in the picture for a long time with you and your family?
A. I believe so.
Q. That he would be a friend to you and your family and assistance, and that he would have your family as his family?
A. Well, that we would be his friends for a long time, yes.
Q. Did you ever tell him that you loved him as much as you loved any other member of your family, including your children?
A. I believe that I would have said that I love him very much.
Q. Did you ever tell him that you loved him as much as any other member of your family, including your children, as much as you love your children?
A. I don't remember saying that.
Q. Did you ever send Mr. Jackson any letters?
A. I probably have.
Q. Did Mr. Jackson ever ask you to leave 9379

1 Neverland?
2 A. Never.
3 Q. Did you believe that you had to leave
4 Neverland at some point?
5 A. No.
6 Q. Was Mr. Jackson going to send you to Paris?
7 A. No.
8 MR. ZONEN: May I approach the witness, Your
9 Honor?
10 THE COURT: Yes.
11 MR. ZONEN: Mr. Mesereau, here's the
12 original of the letter I gave you.
13 Q. I'm going to show you Exhibit 897, 8-9-7, a
14 two-page letter. Go ahead and take a moment and
15 look at it.
16 You can hold on to it. I may ask you a
17 couple questions about it.
18 Did you read the letter in its entirety?
19 A. Uh-huh.
20 Q. Do you recognize that letter?
21 A. I believe so.
22 Q. Is that a letter that you wrote?
23 A. I believe so, yes.
24 Q. It's in your handwriting?
25 A. Yes, it is.
26 Q. Do you have a recollection of having written
27 it?
28 A. Uh-huh. 9380

Q. Is it true that you said in that letter, “I love my family deeply, and I love you as much as I love them”?
A. I believe -- well, I’ve read this. Yes, I did say that.
Q. I’m sorry?
A. I did write that, yes.
Q. And was that a true statement when you wrote it?
A. Yes. Well, I wanted to let Mr. Jackson know that I loved him very much, and I -- I believe that I had hurt him at some stage because I was behaving inappropriately. And that’s why I wanted to apologize profusely, just to let him know that I was regretful of what I had done.
Q. This was written September 9th, 1992; is that correct?
A. That’s correct, yes.
Q. You wrote in the letter that, “Bill told you yesterday we were responsible for your illness. I felt like killing myself.”
A. Uh-huh.
Q. And that is something that you wrote; is that correct?
A. That’s correct.
Q. All right. “Bill” is who? Bill Bray?
A. That’s correct.
Q. Who is Bill Bray? 9381

A. He was Mr. Jackson's head of security.
Q. Okay. And in 1992, your son was how old?
A. Ten. Oh, 10 going on 11 at that stage. Ten and a half.
Q. So you had known Mr. Jackson about a year at that point?
A. That's correct.
Q. What illness was it that you believed that you were responsible for?
A. Well, from -- from my recollection of this particular incident, we were on tour and -- with Mr. Jackson on -- in the European tour of the "Dangerous" tour --
Q. Ma'am, what illness was it that you believed --
MR. MESEREAU: Objection. He's cutting off the witness.
MR. ZONEN: I'll object as nonresponsive, the answer.
THE COURT: Sustained.
Q. BY MR. ZONEN: Tell us what illness it was that Mr. Jackson had that you believed you were responsible for.
A. I don't recall what the illness was.
Q. But it was serious enough that you felt like killing yourself?
A. Well, it was probably a bit overdramatic what I had written there, but it was only because I 9382

1 felt so bad about it.
2 Q. But now you don't even remember what illness
3 it was?
4 A. No, I don't remember what the actual illness
5 was, but I remember that I had caused him some
6 grief.
7 Q. Did he have an illness that required medical
8 attention?
9 A. I'm not sure whether it actually required
10 medical attention, but I know that he felt that he
11 was feeling unwell at the time.
12 Q. Feeling unwell physically or emotionally?
13 A. I guess probably emotionally. I don't know.
14 But all I know, that he was feeling unwell. I don't
15 really know the extent of -- I don't remember
16 what -- what -- actually how he was feeling, what
17 the actual feeling was, whether it was physical or
18 whether it was emotional. I don't have any
19 recollection of that.
20 Q. And was this because of an outburst of some
21 kind that you staged?
22 A. Pretty much. Well, it was a personal matter
23 between Mr. Jackson and myself.
24 Q. What did you say to him --
25 A. Um --
26 Q. -- that caused you to feel like killing
27 yourself?
28 A. Well, this is -- the reason why I felt so 9383

bad is because it was -- I -- what happened was that during the tour, there was a particular city that we were visiting. There wasn't quite enough VIP passes for everyone, because they had VIP passes for numerous guests.
Q. What city were you in?
A. I don't actually recall which city.
MR. MESEREAU: Objection. The prosecutor interrupted.
THE COURT: Sustained.
MR. MESEREAU: May the witness be allowed to complete her answer, Your Honor?
THE COURT: Yes.
MR. ZONEN: I'll object to the narrative form of the answer.
THE COURT: Well, you asked the question.
MR. ZONEN: I'll withdraw my objection, Judge. I'm sorry.
THE COURT: Go ahead. Do you want the part that you've already said read back, so you can complete your answer?
THE WITNESS: That's -- please.
THE COURT: All right.
(Record read.)
THE WITNESS: And I was informed that we -- I wasn't able to go and see the show. And I was upset over that, and that's -- I'm ashamed to be telling this to everyone, but that's pretty much 9384

what happened. And I didn't realize that particular outburst was going to make him feel bad.
And what happened was that he explained to me that he had several things on his mind and that he wanted to make us happy, and because I was being -- I was unhappy, that was causing him grief. And so I felt pretty much disgusted with myself for having --
Q. BY MR. ZONEN: What city were you in?
A. I don't recall which city it was. It was a city before -- possibly before Paris, or -- I'm not really sure.
Q. What country were you in?
A. Again, I don't remember.
Q. You were in Europe?
A. We were in Europe, yes.
Q. So you've done tours with Michael Jackson in Europe, in South America, and in the United States?
A. Well, I didn't actually tour with Mr. Jackson in the United States.
Q. All right. On this particular occasion, the occasion of writing this letter, you were someplace in Europe; is that right?
A. That's correct, yes.
Q. And you had some kind of an outburst that upset him deeply?
A. Uh-huh.
Q. All right. 9385

A. And it was to do with the fact that --
Q. I'm sorry?
A. It was to do with the fact that I didn't --
I wasn't able to go to a particular show.
Q. And to whom did you complain about not being
able to go to this show?
A. I believe it was with -- possibly with Mr.
Bray and with Mr. Jackson.
Q. So Mr. Jackson was there at the time?
A. Yes, he was.
Q. And you had an outburst, complaining about
not being able to go --
A. I call it an outburst, but it was the fact
that I showed my displeasure, and that -- because I
was upset, in a way that upset him, because he
wanted us to be -- to be happy and to enjoy the
tour, and it seemed like I wasn't because I wasn't
able to go to one of the shows. And it was very
petty and -- on my behalf.
Q. Actually, you didn't say "outburst," you
said "outbursts," plural. You had a few of them,
didn't you?
A. No, I didn't have a few outbursts. But
probably -- it could have been because I -- I had
expressed my displeasure with Mr. Bray and then with
Mr. Jackson. That could have been why it's in
plural.
Q. Now, because you had an outburst over your 9386

displeasure at not going to a concert, you felt like killing yourself, and you wrote that in a letter to Mr. Jackson?
A. I did, but that -- again, like I said, it's probably an overdramatic statement because of the fact that I felt so bad. I wanted to let him know how bad I felt, but I had no intention of killing myself. But it's just to -- that was just an expression to let him know that I was very, very remorseful and how bad I felt about it because of the fact that I had been selfish.
Q. Did your son actually go to that concert?
A. Yes, he did.
Q. Was --
A. No, no, sorry, he didn't go to the concert, but he was on the tour with us, yes.
Q. He did not go to that concert either?
A. I don't believe so.
Q. Did you tell Mr. Jackson in this letter that you were prepared to leave?
A. Yes, I did.
Q. Did you tell him, "The only thing that we will not do, we will not leave without Brett, and that could be a bit of a problem"?
A. That's correct. Yes.
Q. All right. Did you anticipate at that point that Brett would not want to go with you if you left?
A. Yes, because Brett was having such a great 9387

time and he would have been very disgruntled about having to leave and probably would have been throwing tantrums, I guess.
Q. You wrote, “If the Paris business bothers you, we would be quite happy to go someplace else to avoid any situation”; is that right?
A. Yes.
Q. What’s “the Paris business”?
A. Well, that could have been that -- that occasion that -- the concert, that particular concert I’m talking about.
Q. So you think it might have been in Paris that you had an outburst?
A. Yes. Whether the concert was in Paris or not, I’m not sure. But it was in Paris that actually --
Q. Was your son sleeping with Michael Jackson during the course of that tour in Europe?
A. At some time, yes. At some stage.
Q. Well, how often would he spend nights with Mr. Jackson as opposed to his family?
A. I don’t remember.
Q. Did you have a conversation with an investigator for the defense last night?
A. Not last night, no.
Q. The night before?
A. Not the night before, no.
Q. From yesterday at 2:30, from yesterday at 9388

2:30 in the afternoon --
A. Yes.
Q. -- did you discuss your testimony or anybody else's testimony with either Mr. Mesereau or any other member of the defense team, lawyer or investigator?
A. No.
Q. You had no discussion with anybody from 2:30 on yesterday, no one at all?
A. No.
Q. Nobody told you what questions you might be asked today based on yesterday's testimony?
A. No.
MR. ZONEN: Thank you. I have no further questions.

REDIRECT EXAMINATION
BY MR. MESEREAU:
Q. The prosecutor for the government asked you questions about Mr. Jackson, saying that you'd been friends for a long time. Do you remember that?
A. Yes.
Q. Have you been friends with Mr. Jackson for a long time?
A. Yes.
Q. For how long?
A. Since 1987, I would say.
Q. And you're his friend today, correct? 9389

A. That's correct.
Q. The prosecutor for the government asked you questions about loving Michael Jackson. Do you remember that?
A. Yes.
Q. Do you love Michael Jackson?
A. I do, very much.
Q. Why?
A. Because he's a caring, a generous, considerate human being. He's just a great person.
Q. Have you ever been embarrassed about loving Michael Jackson?
A. No. I'm proud of it.
Q. The prosecutor asked you questions about Mr. Jackson referring to you as family, correct?
A. That's correct.
Q. And has he done that?
A. Yes, he has.
Q. Have you referred to Mr. Jackson as part of your family?
A. Yes.
Q. Do you consider Mr. Jackson part of your family?
A. Yes.
Q. Why?
A. Well, I guess it's just the closeness that I feel, that it's a little bit more than just friendship, so -- 9390

Q. And he asked you questions about having to leave Neverland or something like that. Do you remember that?
A. Uh-huh.
Q. You're staying there right now, aren't you?
A. That's correct.
Q. Ever been forced to leave Neverland?
A. Never.
Q. Never had to escape from Neverland?
A. Never.
MR. ZONEN: Objection; exceeding the scope of cross-examination.
THE COURT: Overruled.
Q. BY MR. MESEREAU: Ever gotten in a hot air balloon at Neverland?
MR. ZONEN: Objection; irrelevant.
THE COURT: Sustained.
MR. MESEREAU: No further questions.

RECROSS-EXAMINATION
BY MR. ZONEN:
Q. With whom did you speak prior to your testimony today, at any time prior to today, about your testimony?
A. Who do you mean? Anyone --
Q. At the time that you arrived in California, did you talk to anybody about your testimony?
A. From the time I arrived in California, I had

a meeting with Mr. Mesereau for about five to ten minutes. And with Mr. Scott Ross.
Q. For how long?
A. For about probably --
Q. I'm sorry?
A. Between 15 to 20 minutes.
Q. You've had 25 minutes of meeting since you've arrived in California for preparation for your testimony today and that's all?
A. Yes. I believe so.
Q. Now, when you were still in Australia, did you have conversations with Mr. Ross over the telephone?
A. No.
Q. Did you have conversations with Mr. Mesereau over the telephone?
A. No.
Q. Did you have a conversation with anybody in Australia before -- anybody while you were in Australia about your testimony, or about this case?
A. No. Well, within my family we did talk about it, but -- with my husband and my children, but that's about it.
Q. Did anybody from the defense team contact you in Australia?
A. No.
Q. Well, how did you know you were coming to California? 9392

A. I offered to come and help Mr. Jackson. I offered to come testify.
Q. You offered to whom?
A. To Mr. Jackson.
Q. You called Mr. Jackson?
A. I called his office and told them that I was willing to -- to testify.
Q. With whom did you speak?
A. To Grace.
Q. You had a conversation with Grace?
A. Well, I rang her and I told her I was willing to do so and she contacted me. She -- to let me know that, yes, it was -- it was okay to do so. And then they made the arrangements.
Q. And nobody talked to you at all about what you would say?
A. No.
Q. So nobody had any idea what you would say before you arrived here?
A. No.
Q. And then you had a total of 25 minutes of conversation between two different people?
A. Yes.
Q. All right. And in Australia, did Mr. Oxman call you, Brian Oxman?
A. No. He never called me.
Q. Did he call your son?
A. I believe he called him at some stage, yes. 9393

Q. All right. So Mr. Oxman had a conversation with your son; is that right?
A. Yes, he did.
Q. And did he ask your son questions about what you would be saying as well?
A. No. That was prior to me making that decision.
Q. So your son had already made the decision to come to Neverland when you then made a decision --
A. That's correct.
Q. -- at a subsequent time?
A. Uh-huh.
Q. And nobody had spoken with you about your testimony prior to that?
A. No.
Q. And then after you made the decision, you called Mr. Jackson's who? Nanny? Is that who that was, Grace?
A. Yes.
Q. And his nanny was the only person you spoke to about any substantive information about your testimony; is that correct?
A. Well, she was the person I communicated with, and she made the proper arrangements and it was -- all the arrangements was made through her.
Q. And nobody called you back to discuss your testimony?
A. No. 9394

Q. Were you given an affidavit to sign or a declaration to sign at some time before coming to the United States?
A. No.
Q. Did you sign a declaration or affidavit after arriving at the United States?
A. No.
MR. ZONEN: No further questions.
MR. MESEREAU: No further questions, Your Honor.
THE COURT: All right. Thank you. You may step down.
THE WITNESS: Thank you.
THE COURT: Call your next witness.
MR. MESEREAU: The defense will call Ms. Karlee Barnes.
BAILIFF CORTEZ: Mr. Sneddon? Do you still want the letter here?
MR. SNEDDON: I'll take it.
MR. SNEDDON: Photographs too?
BAILIFF CORTEZ: No.
THE CLERK: Please raise your right hand.

KARLEE BARNES
Having been sworn, testified as follows:

THE WITNESS: I do.
THE CLERK: Please be seated. State and 9395

spell your name for the record.
THE WITNESS: My name is Karlee Barnes.
K-a-r-l-e-e; B-a-r-n-e-s.
THE CLERK: Thank you.

DIRECT EXAMINATION
BY MR. MESEREAU:
Q. Good afternoon, Miss Barnes.
Miss Barnes, where is your home?
A. In Melbourne, Australia.
Q. And do you know the gentleman seated at
counsel table to my right?
A. Yes, I do.
Q. Who is that?
A. That's Michael Jackson.
Q. And is he a friend of yours?
A. Yes, very --
Q. How long --
A. Very good friend.
Q. How long has he been a friend of yours?
A. Well, about almost 18 years. We first
started speaking on the telephone, and I've known
him in person for about 13 years.
Q. How did you first get in contact with Mr.
Jackson?
A. Well, it was pure luck really. When I was
about seven years old or so, my brother and I were
really, really great big fans of Michael, and my 9396

brother wanted to write a letter to him.
So he -- well, with my assistance, we got a
letter out to him, and we badly -- really, really
badly wanted to go to his concert. That was his
“Bad” tour. But my mom wouldn’t let us go, because
we were too small. We’d get crushed by the crowd.
So as a consolation, she let us go see his arrival
at the airport.
And at the airport, he had a number of
dancers and backup singers and band members there
promoting, giving us show bags and things like that.
So my mom handed the letter to one of his dancers,
who put the letter into a mail bag.
And fortunately, one day Michael decided to
pull out a letter and read it, and he put his hand
into the fan mail bag and he pulled out my brother’s
letter, read the letter, and he decided to telephone
us to say thank you.
And from there --
Q. And approximately what year was that?
A. It would have been about ‘87. Or ‘88.
Q. And did you speak with him on the phone that
time?
A. Yes, I answered the telephone.
Q. Okay. And this was in -- this was at your
home?
A. Yes. It was at home.
Q. Okay. And how long did you speak to Michael 9397

Jackson?
A. Well, when I answered the telephone, I --
you know, I said, “Hello?” And a voice comes back,
“Hi. May I please speak to Brett?” And I was like,
this isn’t somebody I’ve spoken to before. And I
said, “Brett Barnes?” And he’s like, “Yes, please.”
And I said, “Okay. I’ll just go get him for you.”
I put the phone down. And my mom said,
“Who’s on the phone?” And I said, “I don’t know,
but it sounds like Michael Jackson.”
And so I ran outside, and I’m like, “Brett
Brett, Brett, Michael Jackson’s on the phone,” and
we’ve gone running back inside.
But after that, I was just too shy to speak
to him, so it was really only when I answered the
telephone that I spoke to him the first time.
Q. Okay. When did you next have communication
with Michael Jackson?
A. It was -- it was such a long time, I really
don’t remember. But he did call us quite frequently
from then on.
Q. And did you used to speak to him from time
to time?
A. Yes. Of course, after I lost, you know, my
shyness, I definitely loved getting on the telephone
to speak.
Q. Did you talk to him a lot?
A. Yes. 9398

Q. Did you become his friend?
A. Yes.
Q. Okay. Did your family become friends of Michael Jackson?
A. Yes.
Q. And you're still his friend, right?
A. Yes, definitely.
Q. Where are you staying at the moment?
A. I'm staying at his ranch, Neverland Valley.
Q. And had you stayed there before this trip?
A. Yes.
Q. How many times do you think you've stayed at Neverland?
A. Oh, many, many times. I wouldn't know exactly.
Q. Okay. And do you remember the first time you visited Neverland?
A. Yes, that was just after I finished the sixth grade, so that would have been like the -- the Christmas of 1990, like 1991.
Q. And who did you visit Neverland with, if you remember?
A. My mom and my dad and my brother Brett.
Q. How long were you there?
A. Oh, that I really can't remember.
Q. Okay. What's your first memory of Neverland when you first saw it?
A. Oh, amazement. I was just so excited and so 9399

happy and just so thrilled to be there. And it was just -- it was like going into this -- I don't know, like this paradise that I've never seen before. And it was just, yeah, wonderful.
Q. You still enjoy going there?
A. Every time I come back it feels like I'm coming home.
Q. Okay. Now, the first time you visited Neverland, do you recall where you stayed?
A. Yes. The first time my brother and I stayed in Unit 3.
Q. Okay. And have you ever been in Michael Jackson's bedroom at Neverland?
A. Yep.
Q. Do you recall the first time you ever were in Michael Jackson's bedroom?
A. Well, the first time we went to his bedroom was when we first met him, he came -- like our family was invited to meet him in his bedroom.
Q. Have you been in his bedroom many times?
A. Yes.
Q. And describe his bedroom, if you would.
A. Well, it's like a normal bedroom, really. He's got a bed, and he's got some chairs. And he's got a bathroom.
Q. And it's two levels, right?
A. Yes, that's right.
Q. And what else have you seen in his room that 9400

you recall?
A. At one stage he had, like, a throne in there, like a big chair. And he had books, and some things that fans have given to him, like a lot of memorabilia.
Q. And have you ever spent the night in Michael Jackson's room?
A. Yep.
Q. How many times do you think you've done that?
A. Well, I don't remember exactly how many times, but I do recall at least twice.
Q. Have you ever spent the night there with your brother?
A. Yes.
Q. Has Michael Jackson ever made you feel like you weren't welcome into his room?
A. Never.
Q. Has he ever made you feel that you could go into his room whenever you wanted?
A. Yeah. I mean, basically he's always said to us that his house is our house, we're free to go wherever we like whenever we like.
It's out of personal respect that I, you know, wouldn't just walk anywhere, just, you know, because everybody deserves a little privacy.
Q. Has Mr. Jackson ever made you feel unwelcome in his home at any time? 9401

A. Never, ever, ever.
Q. Have you ever gone to his room and just knocked on the door?
A. Yes.
Q. And has he been in the room when you knocked on the door?
A. Yes.
Q. Did he let you in?
A. Yes.
Q. Have you ever been in Mr. Jackson's room with your mom?
A. Yes.
Q. How many times do you think you've been in his room with your mom?
A. Again, I'm not really sure, but it has been on more than one occasion.
Q. Now, do you recall ever being in Mr. Jackson's room late at night?
A. Yeah, I've stayed -- I've slept in his bedroom.
Q. And what were you doing in his room at the time?
A. Sleeping.
Q. Well, besides sleeping. What --
A. Oh, well --
Q. Let me rephrase the question. It's not a good question.
Before you fell asleep in his room, what 9402

were you doing?
A. We were all talking.
Q. Okay.
A. And, you know, just having fun.
Q. Uh-huh. What kind of fun?
A. I don't know. The fun that kids have. Just making fun of each other and telling jokes. And, you know, doing silly dances, and, you know, just things like that.
Q. And would Mr. Jackson do that with you?
A. Yeah, he liked skipping and jumping, like all of us.
Q. Have you done silly dances with Mr. Jackson?
A. Yeah, we always like do, you know, crazy things.
Q. Have you walked around Neverland with Mr. Jackson?
A. Yeah, many times.
Q. And what have you done when you did that? Excuse me. That's not a good question. When you walked around Neverland, what were you guys doing?
A. Well, talking, telling jokes. Same sort of thing. You know, running as fast as we can, challenging each other to races. Stopping to look at the animals. And, you know, things like that.
Q. And Mr. Jackson would do that with you?
A. Yeah. 9403

Q. Okay. Have you been to the theater at Neverland?
A. Yes.
Q. Been in the theater with Mr. Jackson?
A. Yes.
Q. What have you done in the theater?
A. Watched movies.
Q. Okay. All right. Do you recall a Jacuzzi at Neverland?
A. Yes.
Q. Have you been in that Jacuzzi?
A. Yes, I have.
Q. Have you ever seen Mr. Jackson in it?
A. Yes, I have.
Q. How about your mom?
A. Yes.
Q. How about your brother?
A. Yes.
Q. Have you ever traveled with Mr. Jackson?
A. Yes, I have.
Q. And how many times have you done that?
A. Well, I've been to, like -- well, in my first -- in seventh grade, I spent half of the year over in Europe with him. And in the eighth grade I spent half of the year over in South America. And I've been to Chicago. And we've been to Las Vegas. So I've been, you know, lucky, very fortunate.
When he came to Australia for his "History" 9404

1 tour, he took us to South Australia and to Western
2 Australia. So I've been on many, many trips with
3 him.
4 Q. Have you ever been into the -- in the
5 swimming pool --
6 A. Yes.
7 Q. -- at Neverland?
8 A. Yes.
9 Q. And has Mr. Jackson been in there with you?
10 A. Yes, he has.
11 Q. Ever recall Mr. Jackson being pushed into
12 the pool?
13 A. Yes.
14 Q. What happened?
15 A. The boys -- like, there was myself and my
16 brother and two of Michael's cousins. And we would
17 just -- we'd been playing. We had had an egg hunt,
18 because it was around Eastertime. And then the boys
19 decided that they were going to be, you know, a bit
20 more crazy, and they started throwing eggs at
21 Michael and putting them in his hair, and then, you
22 know, they pushed him into the pool just to taunt
23 him even more.
24 Q. Has Mr. Jackson ever hugged you?
25 A. Yes. Many times.
26 Q. Have you ever been suspicious when he hugged
27 you?
28 A. Never, ever. 9405

Q. Has Mr. Jackson ever kissed you?
A. On the cheek, yes.
Q. Have you ever been suspicious of his behavior when he did that?
A. No, never.
Q. Have you ever hugged Mr. Jackson?
A. Plenty of times.
Q. Ever kissed Mr. Jackson?
A. Of course. On the cheek.
Q. Have you ever been suspicious of anything he did when you hugged or kissed him?
A. No, never.
Q. Have you seen Mr. Jackson hug your brother?
A. Yes, I have.
Q. Have you seen him kiss your brother?
A. Yes. On the cheek, yes.
Q. Were you ever suspicious of the behavior when he did that?
A. No, never, ever.
Q. When you were in Mr. Jackson's room, did you ever see Mr. Jackson do anything inappropriate to your brother?
A. No, never, ever.
Q. Have you ever seen Mr. Jackson touch your brother in a sexual way?
A. No.
Q. Have you ever seen Mr. Jackson molest your brother? 9406

A. Never.
Q. When you were traveling, your family, with
Mr. Jackson did you see you brother with Mr. Jackson?
A. Yes, I have.
Q. Have you ever been suspicious of any of Mr.
Jackson's behavior towards your brother?
A. Never.
MR. MESEREAU: I have no further questions.

CROSS-EXAMINATION
BY MR. AUCHINCLOSS:
Q. Good afternoon, Miss Barnes.
A. Hello.
Q. You are positively thrilled to be a friend
of Michael Jackson's, aren't you?
A. Absolutely.
Q. You seem almost giddy about it.
A. I love him with all of my heart. I've known
him since I was about seven or eight years old, so
he's one of my closest fields.
Q. Do you feel giddy when you're going to see
him a little bit, excited?
A. I feel no more excited than I would if I was
seeing one of my other close friends that I haven't
seen in a while.
Q. Well, but he's different, isn't he?
A. No, he's not. He's just a normal human
being like anybody else. He's got the same organs, 9407

1 the same blood, the same emotions, the same feelings
2 as anyone else.
3 Q. Well, but not everybody has Neverland, true?
4 A. Well, he's worked hard to get everything
5 that he wants, so everything that he has he's worked
6 really, really hard for.
7 Q. And he shares it with you?
8 A. Yes.
9 Q. And you love going to Neverland?
10 A. Of course I do.
11 Q. You get thrilled when you get to go there?
12 A. Of course.
13 Q. And when you were a child and you got to go
14 to Neverland, it's kind of like having everything
15 you ever wanted as a kid, isn't it?
16 A. It's like going to a theme park and a zoo
17 all at once, yeah.
18 Q. But it's better than that, isn't it?
19 A. Well, I guess so, yeah.
20 Q. Because it's all yours, it's all private,
21 right? No other kids, no crowds?
22 A. There are other kids, though, because, you
23 know, it's even better when there are other people
24 there to, you know, play games with, have fun with
25 and share things with.
26 Q. Haven't you been there when it was just your
27 family?
28 A. Yes, I have. 9408

Q. And you get to stay up late?
A. Yes.
Q. And you get to have whatever you want to eat whenever you want it, right?
A. Like when I'm on any other vacation or holiday, yes.
Q. And you can play with Michael Jackson, the superstar, right?
A. No, Michael Jackson, the human being.
Q. Well, he is a superstar.
A. Yeah, I recognize that, but he's also a normal human being like anybody else.
Q. But didn't you say that you were a huge fan of Michael Jackson's before you ever met him?
A. Yes. Yes, I was. And I'm still a huge fan of his music today.
Q. Okay. So you greatly admire him for that?
A. I admire him for many things, yes, including his music.
Q. Okay. Now, you testified a little bit about your experiences with Michael Jackson and your brother.
A. Yes. Yes.
Q. And the very first night that you went to Neverland, you spent all night in his bedroom, didn't you?
A. Well, we didn't spend all night in his bedroom, no. We took a tour of the ranch. We went 9409

on the train that goes around the ranch. We saw, you know, as much we could of the theme park, the zoo. Because my brother and I were so excited to see a place we'd never been before, we spent the whole night trying to see everything all at once.
Q. Okay. But eventually you went back to Mr. Jackson's room, correct?
A. We might have. I don't remember.
Q. Didn't you tell an investigator that; that you spent the entire first night at Neverland in Mr. Jackson's room?
A. No, I didn't.
Q. You weren't playing video games in his room?
A. I didn't say that, no.
Q. Did you go into his room that night?
A. I did go into his room that night when we first met him, yes.
Q. Did you stay up all night?
A. Yes, I did stay up all night, as I said before, both of us.
Q. And --
A. And I remember this because we slept the whole day the next day.
MR. AUCHINCLOSS: It's nonresponsive. I'll object.
THE COURT: Sustained.
Q. BY MR. AUCHINCLOSS: Now, Miss Barnes, how many nights have you spent at Neverland? 9410

A. I don't remember. It's been that many that
I -- I simply can't recall.
Q. Hundreds, maybe?
A. Well, I wouldn't say hundreds. But
definitely more than 10, 20, 30 times, yes.
Q. More than a 100?
A. I don't remember, but maybe.
Q. Okay. And of that 100 or so nights at
Neverland, you've spent only two nights in Mr.
Jackson's room?
A. That I remember, yes.
Q. Okay. And of those 100 nights that you
spent at Neverland, how many nights was Mr. Jackson
there?
A. Probably about 80, 90 percent.
Q. Okay. And of that 100 nights, how many
nights was your brother there?
A. All the time.
Q. Okay. Every time that you were there?
A. Every time I was there, my brother was
there, yes.
Q. And of those hundred or so nights, 80
percent of the time your brother slept -- when Mr.
Jackson was there, your brother basically slept in
Mr. Jackson's room virtually every one of those
nights, didn't he?
A. Yes, because he wanted to.
Q. That's a "yes" or "no" question. 9411

A. Yes.
Q. Can you tell me why you didn't spend the night in Mr. Jackson's room as much as your brother?
A. Because I'm a girl, and I prefer to have a little bit of privacy.
Q. Okay. I see. Is it your opinion that -- well, let me back up.
How old was your brother at that time?
A. What, when we first started going to his house?
Q. Uh-huh.
A. He was about -- well, I was about 12, so he was about ten.
Q. Okay. So are you saying that it's okay for a 35-year-old man who's unrelated to sleep with a ten-year-old boy, but it's not okay for a 35-year-old man who's unrelated to a girl to sleep with her?
A. I'm not saying that at all. I'm saying that from my personal point of view, I was developing into an adult, and I was at the stage where I wanted my own privacy.
Q. Uh-huh.
A. And there were times when I was happy to, you know, hang out with them and sleep in their room, and there were times when I wanted to have my own room.
Q. Only two nights that you felt like sleeping 9412

with them?
A. That I remember, yes.
Q. Okay. Did you know that there were other boys that were at Neverland?
A. Yes.
Q. Did you see other boys when you were at Neverland?
A. Yes.
Q. Did you see them sleep in Mr. Jackson's room?
A. Yes.
Q. Mr. Jackson chose your brother to be a very special friend of his, didn't he?
A. Yes, because the reason why --
Q. That's a "yes" or "no" question.
A. Yes. Well, yes.
Q. Thank you.
Now, when you went on tour with Mr. Jackson, you spent how many nights on tour?
A. Well, as I said, it was about half the year I was in Europe when I was in the seventh grade, and about half of the year I was in South America in the seventh -- in the eighth grade.
Q. How old was your brother at that time?
A. I was what, 13, 14. So he would have been about 11 or 12.
Q. And virtually every night on that tour, Mr. Jackson slept with your brother Brett? 9413

A. Yes.
Q. How many nights would that have been, approximately?
A. Let's see, let's divide 365 days into half.
Q. Okay. Is that about it? About --
A. Well, if I said I spent half the year overseas with him one year and half of the year overseas with him the other year, I think that would total about 365 days altogether.
Q. Okay. So 365 nights he spent the night alone with your brother in his room?
A. Yes.
Q. Did that ever -- did that ever seem odd to you?
A. No.
Q. Didn't seem odd to you that a 35-year-old man --
A. Not at all.
Q. -- is sleeping with a ten-year-old boy?
A. Not at all.
Q. During this entire period of time that you've known Mr. Jackson, has he given you gifts?
A. Yes, he has.
Q. Did he fly you over to the United States?
A. Yes, he has.
Q. Do you fly first class?
A. I have flown first class, and I've also flown business class. 9414

Q. Did your mother permit this?
A. Yes. And so did my father.
Q. And do you know if your brother thinks it's a disgrace to be a victim of a child molestation?
A. Of course he would. I do, too.
Q. So if he had to admit that, it would be disgraceful, wouldn't it?
A. Well, no, it's a disgrace that it would happen to a child. Not a disgrace to admit that it happened, but a disgrace that it has happened, if it has happened.
MR. AUCHINCLOSS: Thank you. No further questions.

REDIRECT EXAMINATION
BY MR. MESEREAU:
Q. The prosecutor for the government asked you about your brother being a special friend of Michael Jackson. Are you a special friend of Michael Jackson?
A. Yes. And my parents are as well.
Q. Why?
A. Well, because we treat him just as we would treat anybody else, as a normal human being. We don't take advantage of him, we trust him, we love him, and we give him a normal sense of life that so many other people never, ever do.
Q. The prosecutor for the government asked you 9415

about your brother sleeping with Michael Jackson, okay?
A. Yes.
Q. And you were traveling when your brother would be in Mr. Jackson's room, right?
A. Yes.
Q. Did you ever suspect anything improper was going on?
A. Never.
Q. The prosecutor for the government asked you if -- didn't it seem odd that Michael Jackson was in a room with your brother. Did you think it was odd?
A. No, I didn't think it was odd.
Q. Why?
A. Because -- well, he's a family friend. He's like a brother to us. He's given us -- not just given us gifts and given us things, but he's -- you know, he's given us --
MR. AUCHINCLOSS: Objection; narrative.
THE COURT: Overruled.
You may finish.
THE WITNESS: He's given us friendship and, you know, experiences that we would never get to see, you know, and....
My brother really always wanted to be there. He wanted to spend every minute, and he still wants to spend all of his minute -- all his time with him.
MR. AUCHINCLOSS: Objection; nonresponsive. 9416

THE COURT: All right.
THE WITNESS: And that's why it's not strange, because my brother wanted it.
MR. AUCHINCLOSS: Objection; it's non-responsive.
THE COURT: Overruled.
Q. BY MR. MESEREAU: The prosecutor for the government asked you about victims of child molestation. Did you ever think your brother was a victim of child molestation?
A. Never.
Q. Did you ever think you were a victim of child molestation --
A. Never.
Q. -- of Michael Jackson?
A. Never.
Q. Now, have you learned about allegations in this courtroom that somehow your brother was improperly touched?
A. I have heard that that has been said by other people.
Q. What do you think of that?
A. I think they're liars.
MR. MESEREAU: No further questions.

RECROSS-EXAMINATION
BY MR. AUCHINCLOSS:
Q. Miss Barnes, has it ever occurred to you 9417

that virtually all families that have victims of child molestation where the molester is a friend and acquaintance, has it ever occurred to you that they are shocked and disbelieving when they learn that fact?
MR. MESEREAU: Objection. No foundation; argumentative.
THE COURT: Sustained.
MR. AUCHINCLOSS: Goes to credibility.
THE COURT: The objection is sustained. Argumentative.
MR. AUCHINCLOSS: Nothing further. There's no question.
THE COURT: That's true.
MR. MESEREAU: Oh, okay.
THE COURT: But you could say, "No questions."
You may step down.
THE WITNESS: Thank you.
THE COURT: (To the jury) I think it's time for you folks to go home. We've got a couple of things to do, and I think we'll just recess until Monday morning.
Let me tell you another day we've just --
I've been asked if we could take the 20th of September, which is -- or "September."
(Laughter.)
THE COURT: I'm going to give you the 20th 9418

of September.
The 20th of this month, May, one of the attorneys has asked -- one of the attorneys has a commitment which I'm going to allow him to keep. And I think it's good, too, that we get a break like that.
So next Tuesday afternoon we're off, and the 20th of May. And we think we're on schedule, just so you're -- if you're wondering about that information. Everything looks like we're right on schedule. So see you Monday.
Remember the admonitions.

(The following proceedings were held in open court outside the presence and hearing of the jury:)

THE COURT: Mr. Sneddon, you had an issue you wanted to take up.
MR. SNEDDON: Yes. Actually, I have two issues, Your Honor.
THE COURT: All right.
MR. SNEDDON: The first issue I'd like to address is a discovery issue, which has been an ongoing problem. And I wanted to alert the Court to the details and also make a record in that respect. We announced last week that we were going to rest, and then again the beginning of this week 9419

announced that we figured we'd be finished by Tuesday. We didn't. We finished on Wednesday. But when we began to ask for defense witnesses, we were given the name of six witnesses. Five of them were not even on the defense witness list, and the discovery was provided about five o'clock the day before we were to rest. Then we find out yesterday on the witness stand that one of the witnesses had signed a declaration that we hadn't been provided by the defense.

Last Saturday, I faxed a letter to the defense, after having reviewed the defense witness list and compared that to our discovery, and there are at least 75 to 80 people listed on the defense list where we have no documentation or reason or reports or anything to indicate why those people are going to be called in this case.

Since that time, I've further expanded my research on that issue. There are at least four employees from the ranch for which we have no reports on. Today there were three witnesses that they were going to call that we have no reports on, one of whom was not even on their witness list that was read to the jury.

There are 21 celebrities that they mentioned in their witness list. Of those, 15 have no reports indicating what they're going to testify to.

There are 12 Los Angeles Police Department 9420

officers, only six of which can we identify anything that shows their names in the reports. We have no idea what the others are going to testify to, and I might add that I don't think they know what they're going to be asked to testify to.

In sum and substance, Your Honor, it is not my desire to prolong this case. I have every -- as much interest as this Court does in moving it. On the other hand, in being fair to us and the way that the Court required us to provide discovery to the defense, I think we've been placed in a very unfair posture at this point in the trial with regard -- for instance, just to use an example and then I'll just sit down.

For example, two of the witnesses that were going to be called today, Detective Birchim and Jerome -- James --

MR. ZONEN: Jimmy Johnson.

MR. SNEDDON: It's not Jimmy Johnson. Van Norman. They were witnesses whose depositions were taken in a lawsuit for which we have not been able to gain access because there's Court orders sealing those records. And the defense knows that they're going to call these people as witnesses, yet they've never provided the transcripts to us, yet we provided all of the transcripts of everything we had during the 1993 investigation.

That's the kind of disadvantage that we're 9421

being placed at, and I'm only asking the Court to hold the defense to the same standard that we're held to and were being held to during the presentation of our case.
Now, I'm not unreasonable. I understand that there are going to be times when there are going to be things that are going to be turned over late. That happened to us. Somebody says something different or adds something to something at the last minute. But to have this kind of problem set forth when we're talking about literally hundreds of witnesses with no documentation, I think it's going to be very difficult for us to be prepared to continue and keep this trial moving on track. And I'm asking for the Court to enforce the provisions of the Penal Code that requires the defense to comply with discovery.
Oh, I want to also add, some of the reports that we were provided at five o'clock on Tuesday night were reports that were dated in January. In other words, the defense had had them for four, five months.
Oh, can I -- do you want me to tell you the second thing and I'll sit down, or do you want to do them separately?
THE COURT: Whatever you like.
MR. SNEDDON: Let me do it separately -- at the same time and get it done. 9422

MR. SANGER: At the same time; separate?
MR. SNEDDON: I indicated to the Court that it is our opinion, and we filed a brief on it this morning, that the defense has opened up the area of character evidence by introducing a lot of opinion evidence through all these witnesses, and we're asking the Court to hold a hearing as to what we are entitled to ask, in good faith, of have-you-heard questions and to have some of those people re-called as witness or for future witnesses that may stray into that area.
Thank you.
THE COURT: I haven't seen that material yet.
MR. SNEDDON: Okay.
THE COURT: Usually it's brought over to me as soon as it's filed, so are you sure you filed it this morning?
MR. ZONEN: It was this morning.
MR. SNEDDON: I was under the impression it was filed this morning.
THE COURT: Okay. Usually I have it by now. As to the discovery issue?
MR. SANGER: Yes. Before I address that, can I just -- on the matter of things getting to the Court, we also filed something this morning, and Your Honor, a little while ago, didn't have it.
THE COURT: Which was the -- yeah, I don't have that either. 9423

MR. SANGER: It was the response to --
THE COURT: I know what you're talking -- to the last item on --
MR. SANGER: I remember sequentially what it was, but the substance is escaping me at the moment. Anyway, we did file it. It was on Mr. Viner's testimony.
THE COURT: Viner's testimony. Yes, I -- okay.
MR. SANGER: Well, I suppose all I'm saying is, there may be a glitch somewhere in the conveyor belt from where it started and where it's coming.
THE COURT: I'll check.
MR. SANGER: With regard to discovery, first of all, there's some factual inaccuracies in what Mr. Sneddon just said, one of which is he said that names were not on the witness list that we have included on our list of people that we're trying to give both the Court and counsel prior to calling them.
And that is not correct. They are -- the ones that are added are at the end, starting on page 28 on the sixth amended witness list. So they were put on the witness list, but they are not alphabetical.
THE COURT: But you gave that list yesterday.
MR. SANGER: No, it was -- this last one was a couple of days ago. 9424

THE COURT: The day before?
MR. SANGER: But we have -- well, there's two different lists. Let's just be clear, Your Honor.
THE COURT: I guess the question, though, is, does that really comply if you make a new list and put the name on it the day before you call a witness when you gave the real list several months ago? I mean, I find that to be a little --
MR. SANGER: Let me address that before the Court forms an opinion on this - okay? - if I may.
THE COURT: All right.
MR. SANGER: I'm sorry, I didn't mean to misread what the Court was saying.
What I -- what has happened is, we have witnesses on this -- on the big list that was provided originally in December. The prosecution filed one in December, and then we all filed amended ones in January, and both sides have tried to keep up, all right?
The defense has had to react to certain things that have occurred. For instance, the prosecution has called some people that they indicated at first they weren't going to call, particularly on the 1108. Mr. Abdool was a late addition. He may have been on their master list, but when it came down to figuring who they were really going to call, they called a small percentage 9425

of the people they had on their master list.
THE COURT: I hope you do the same.
MR. SANGER: And we will do the same unless Mr. Sneddon forces us to call every one just to show that we can do it.
What we have done, seriously, is taken the master list, which had, oh, let's see, something like -- by the time we add all these other people, something like 500-and-some people on it.
We've taken that master list -- now, the master list, our understanding of providing it was any name or any possible witness who could be called by either side or whose testimony would figure prominently in the case, or their presence, even if they didn't testify. So we were trying to provide the Court with something that the Court could read and ultimately have counsel read it to the jury so they could see if they knew any of these people. It did not mean that we were going to call everybody.
And I think both sides know that, that that's the case.
Now we're coming down to the people we're calling. We tried to give a list, not just for today, but we gave a list for a couple of three days' worth of witnesses.
As I explained to Mr. Sneddon personally, and as they did, we have to shift things around as time goes on. We expected that, for instance, we 9426

were going to start earlier, and as a result of that, we had other witnesses who were going to be -- who were ready to be called, and now we've had to reschedule them because they're from out of town, and that's just the way it goes. So that's that.
Now, of the people on the list, on our list that we gave to Your Honor and to the District Attorney, the short list, the -- the ones we're calling right now, there was one witness for which we had a declaration which we....
You have it. Okay. I take it you have Mr. Sneddon's as well.
THE COURT: Now I have each of those documents.
MR. SANGER: Thank you.
Of the people that Mr. Sneddon just referred to -- he said there were three people. Of those three people, there was one person, Francine Orozco, who we had a declaration from, and we believed that it had been turned over along with a whole series of declarations that had been turned over. They said they didn't get it.
We went back. We can't show that we gave it to them. I gave a copy immediately to Mr. Zonen and agreed that we would not call Francine Orozco until they had a chance to review it. He said Monday would be fine, so I think we worked that out. We're trying to be reasonable on that. 9427

1 The other two, Russ Birchim is a
2 sheriff's -- I believe he's a commander now, isn't
3 he?
4 THE COURT: I think so.
5 MR. SANGER: He's a commander, and the only
6 thing we were going to ask him about is contained in
7 his reports on this case, and we have not
8 interviewed him independently. There was one other
9 small issue we were going to ask about. I won't
10 announce what it was. I've explained this to Mr.
11 Zonen. It was an issue that he testified to in the
12 Abdool trial.
13 The Abdool court reporter's notes are, by
14 and large, not available, and what few notes we got
15 were such -- they were so garbled, we couldn't read
16 it. In fact, the court reporter hired a computer
17 expert to try to straighten it out and couldn't. We
18 got no notes with regard to this person.
19 So he testified. I told Mr. Zonen what he
20 testified to, which was basically a one-sentence
21 issue, and I said we weren't -- we weren't going to
22 call him for that anyway. So the only issues we're
23 calling him on would be issues for which he wrote a
24 report in this case.
25 The last witness they referred to, James Van
26 Norman, we put on the list not to call him today,
27 but to call him next week. We're just trying to
28 give them a heads-up for a couple, three days, and 9428

we have not reinterviewed him.
Now, I was just told today, and I wasn't aware of this, that the prosecution did not receive copies of the Abdool case. Because they had Mr. Ring on their witness list, my understanding was they had all the depositions and the files. All the public files have been ordered unsealed, with the exception of just a very few, thanks to Mr. Boutrous and his never-ending work over there in Judge Canter's court. I am now informed, as of today, that they did not have these depositions.
I have not reviewed his deposition, and we have no new report. We expect to talk to him before bringing him up here again. I will get his deposition, to the extent we have it, from our old files. If we have it, we will give it to them. So that was really it.
Now, as far as the rest of the people are concerned, we are -- to the extent we knew we were going to call them and we intended to call them and we interviewed them, we have provided reports. If we have any reports on anybody - in other words, anybody that's on the master list - that we intend to call, if we had a report, we turned it over, to the best of my knowledge. I don't know how Orozco slipped through as a declaration, but other than that, we have turned them over.
We understand our obligations. I think 9429

we're complying with them. The People, as Mr. Sneddon acknowledged -- you know, there were -- a couple people actually got on the stand, as the Court may recall, and we didn't have a report from them at all. So it happens. The Court dealt with it and said, "Call them tomorrow." I voluntarily said to do that with Miss Orozco. I suspect that we will cooperate in that regard. I don't think we're going to have a problem. We will have a further meeting today to make sure that all these Abdool depositions that pertain to witnesses we intend to call get turned over.

So I think that really answers the question. We haven't been withholding anything. And I'd suggest -- rather than arguing back and forth, unless there's something I said that was factually inaccurate, I'd suggest we try to continue to work this out, because I have talked with Mr. Zonen and I thought we were doing fine.

THE COURT: Is there a way that you could -- here's the problem that I find from both sides, and that is that if there's no report, the party notifying the other side of the witness could make such a notation beside the name, so it's clear on the record to each other -- not for me, but to each other that there is no report, and it gives them a chance -- and if you say there is a report and they don't have it, they could get it to you immediately. 9430

There's a problem when you don't know if you're just not giving a report, forgot to give a report, or there's no report.
MR. SANGER: More -- beyond that, I would go beyond that. There will be a report on everybody. I mean, even if the report is, "Their statement is their declaration." We actually have one person at this point, the only statement that we could turn over was a statement that a lawyer -- paraphrase of what a lawyer told us. In other words, we haven't had a chance to interview that witness yet. We may or may not before the witness is called. If we do, we'll give a formal report. But we have provided that to the D.A. We'll let them know.
There is the concept of rebuttal, and Mr. Mesereau is reminding me to just let the Court know. Obviously, a couple of these people, I think I said that at the very beginning --
THE COURT: I understood that.
MR. SANGER: -- Orozco and Jimmy Van Norman are really rebuttal to what came up very recently in the case. It's not we're holding back. It's that we're responding the best we can to that.
And we're starting with the '93 segment of the case, which I think is appropriate from our standpoint, but it also is the part where we have the real rebuttal burden because we didn't know whether it was coming in and what was coming in 9431

until late, so it's compounded that problem. But I think we're getting it done.
So if there's any other problem, I would suggest we meet and confer. And -- hold on one second. I'm sorry. Yeah.
(Discussion off the record at counsel table.)
MR. SANGER: And I think the Court understands, for instance, there are experts like the financial expert who just came forward, and we got his PowerPoint I think the very morning he was put on, if I'm not mistaken. So, we -- we have to respond --
THE COURT: I understand there's always problems on both sides.
MR. SANGER: We're doing our best is all I can tell you.
THE COURT: I expect you to comply, as I do both sides.
Is there anything you want to add that?
MR. SNEDDON: Well, I'd like to get out of here early today, Judge, but I just want to say, are we to assume, then, from Mr. Sanger if we don't have a report from anybody, they made the decision not to call them? I mean, there's over 100 people on there, plus, that we --
MR. SANGER: No.
MR. SNEDDON: Well, can we find out? 9432

MR. SANGER: There's 500 people on that original list.
MR. SNEDDON: With no indication why they're coming.
MR. SANGER: Let's just make that clear.
One more time, just like the prosecution gave us a giant list with a lot of people, we gave them a giant list with a lot of people. We're not going to call everybody on that list. So the prosecution can't assume anything from that.
When we give them the list, which we typed out and gave the Court a copy and we gave the prosecution the same thing, when we do this, as we do this, we expect that there will be a report that's been disclosed on every single one of the people that we put on the list before we call them.
And if we have it, we'll give it to them right now.
If we're -- for instance, in the case of the one person who's not on the list yet, the one person who we've only talked to his lawyer, we can't give a further report until we get it. So that's the example.
But as far as other people that are on the master list, nothing should be assumed. I mean, we're going to provide the discovery as soon as we can. And if we interviewed somebody and we intended at the time to call them, we would turn it over, and that's still our position, and that's what we will 9433

do. And I think once we get over the 1108, which is a little bit spontaneous because of the way it came up, it should go a little smoother.

MR. SNEDDON: Judge, the difference is very fundamental. We turned -- we had a list of people and we didn't call them all, but we gave discovery on everybody on that list before this trial started, so that if we did call them they could prepare. There were a couple of people -- there were a couple of people who we added to that list during the course of the trial.

And I don't mind a couple of people being added. We're talking about hundreds of people here, without us having an ability to even know why they're going to be called or what they're going to say, and they're going to walk in here, and I guarantee you, they're going to dump it on us two or three days before they come in here. If we're lucky.

MR. SANGER: We promise not to dump it on them.

MR. SNEDDON: Well, I don't want promises. I want compliance. We had compliance dates that you gave us. Why don't they?

MR. SANGER: Well, I don't know if this is productive. The fact of the matter is, there were a tremendous number of witnesses for which we had no reports. And we were --

MR. SNEDDON: That's not true. 9434

MR. SANGER: And we filed something in writing demanding the reports and we were told they didn't have them. They had several experts in different categories and they gave us no reports. We couldn't even figure out who they were. Your Honor may recall we filed a motion because they had names down there that weren't even real names of people. They had -- I remember one person, they had two people's names put together, totally different people put together with a hyphen, and we spent forever trying to figure out who that was. So we're beyond that, and we're going to do our best and --

THE COURT: What I want you to do is to give them the reports on the witnesses that you have as soon as you possibly can.

MR. SANGER: Yes, sir. That's what we --

THE COURT: That's what's required.

MR. SANGER: That's what we intend to do. And with the exception of Orozco, for which I apologize - that was an old declaration - I think we've been doing the best we can. So we'll --

THE COURT: And I do remember that I gave you some relief. We continued -- you know, we had to put some witnesses off until the next week, or several days, anyway. So if that is happens, you're entitled to the same type of relief.

MR. SANGER: Do you want to address the 9435

character issue, or not?
THE COURT: Not right now. Now I have them.
I haven't read it, so I want time to study what
we're dealing with.
Are you going to file a response to that?
MR. SANGER: That's what I was going to say.
If the Court would like, or give us permission to do
it, we would like to file a response.
THE COURT: I would, if you'll file that
Monday.
MR. SANGER: Yes, sir.
THE COURT: Then I think --
MR. SANGER: Eight o'clock or 8:15 or
something?
THE COURT: Yeah, that's fine.
Now we have to have an in-camera hearing on
the issue that Mr. Mesereau requested, so I'll need
an attorney from each side, the court reporter and
the clerk.
MR. SNEDDON: I'll go in.
THE COURT: And for those present in the
courtroom, there won't be any further open court
sessions today, so if you want to leave, you may.
MR. MESEREAU: Your Honor, can Mr. Jackson
leave?
THE COURT: Yes, Mr. Jackson may leave, too.
(The proceedings adjourned at 1:20 p.m.)
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REPORTER'S CERTIFICATE

THE PEOPLE OF THE STATE OF)
CALIFORNIA,)
Plaintiff,)
-vs-) No. 1133603
MICHAEL JOE JACKSON,)
Defendant.)

I, MICHELE MATTSON McNEIL, RPR, CRR, CSR #3304, Official Court Reporter, do hereby certify: That the foregoing pages 9275 through 9437 contain a true and correct transcript of the proceedings had in the within and above-entitled matter as by me taken down in shorthand writing at said proceedings on May 6, 2005, and thereafter reduced to typewriting by computer-aided transcription under my direction.

DATED: Santa Maria, California,
May 6, 2005.

MICHELE MATTSON McNEIL, RPR, CRR, CSR #3304
OFFICIAL COURT REPORTER 9437